

EXHIBIT E

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
1	Analysis of Chapter 9	Creditor Recoveries Outside Chapter 9	EEPK FMS WT FGIC	DR0134	134. All Documents and Communications concerning the City's analysis of the estimated percentage recoveries for each Class of Unsecured Claims, assuming the City's chapter 9 case is dismissed and creditors are left to pursue their state law remedies.	Conway MacKenzie Wayne Flick Daniel Jerneycic Publicly Available (Documents were exhibits at Eligibility trial or are in the docket)
2	Analysis of Chapter 9	Creditor Recoveries Outside Chapter 9	Syncora	DR0041	All documents relating to any analysis of the City's creditors' recoveries outside of chapter 9.	Conway MacKenzie Wayne Flick Daniel Jerneycic Publicly Available (Documents were exhibits at Eligibility trial or are in the docket)
3	Analysis of Chapter 9	Effect of Not Filing	Syncora	DR0037	All documents relating to or containing any analysis conducted by the City regarding the consequences of not filing for bankruptcy.	Conway MacKenzie Wayne Flick Daniel Jerneycic Publicly Available (Documents were exhibits at Eligibility trial or are in the docket)
4	Asset Valuation	Airport	Ambac	DR0053-E	All documents and communications that relate to the valuation and/or potential monetization, through sale, lease, or otherwise, of City-owned assets valued at more than \$5 million, including without limitation: E. Coleman Young Airport	Kevin Hand
5	Asset Valuation	Airport	Retiree Committee	DR0043-D	All documents setting forth and/or listing the value of each City asset estimated to be worth more than \$5 million, and all documents explaining, discussing, describing, showing or analyzing the valuation and/or potential monetization of any City assets estimated by the City to be worth more than \$5 million, including but not limited to: (d) Coleman A. Young Airport;	Kevin Hand
6	Asset Valuation	Belle Isle	Retiree Committee	DR0043-C	All documents setting forth and/or listing the value of each City asset estimated to be worth more than \$5 million, and all documents explaining, discussing, describing, showing or analyzing the valuation and/or potential monetization of any City assets estimated by the City to be worth more than \$5 million, including but not limited to: (c) Belle Isle Park;	Kyle Herman Jim Doak
7	Asset Valuation	City Owned Land	Ambac	DR0053-G	All documents and communications that relate to the valuation and/or potential monetization, through sale, lease, or otherwise, of City-owned assets valued at more than \$5 million, including without limitation: G. City-owned land referenced in Section III.A.5(b) of the Disclosure Statement.	Kyle Herman Jim Doak Data Room
8	Asset Valuation	City Owned Land	EEPK FMS WT FGIC	DR0089	89. All Documents and Communications concerning the City's efforts to enter into a transaction or series of transactions to monetize the City-owned land referenced in section III.A.5(b) of the Disclosure Statement.	Kyle Herman Jim Doak Data Room
9	Asset Valuation	City Owned Land	EEPK FMS WT FGIC	DR0090	90. All Documents and Communications concerning the City's strategy for treating the City-owned land referenced in section VII.A.5(b) of the Disclosure Statement, including with respect to any proceeds thereof.	Kyle Herman Jim Doak Data Room
10	Asset Valuation	City Owned Land	EEPK FMS WT FGIC	DR0091	91. All Documents and Communications prepared by Ernst & Young LLP concerning the City-owned land referenced in section VII.A.5(b) of the Disclosure Statement.	Ernst & Young

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11	Asset Valuation	City Owned Land	EEPK FMS WT FGIC	DR0092	92. All Documents and Communications concerning the value of the City-owned land.	Kyle Herman Jim Doak Data Room
12	Asset Valuation	City Owned Land	Retiree Committee	DR0043-B	All documents setting forth and/or listing the value of each City asset estimated to be worth more than \$5 million, and all documents explaining, discussing, describing, showing or analyzing the valuation and/or potential monetization of any City assets estimated by the City to be worth more than \$5 million, including but not limited to: (b) City-Owned Land;	Kyle Herman Jim Doak Data Room
13	Asset Valuation	Detroit Windsor Tunnel	Ambac	DR0053-B	All documents and communications that relate to the valuation and/or potential monetization, through sale, lease, or otherwise, of City-owned assets valued at more than \$5 million, including without limitation: B. The Detroit-Windsor Tunnel;	Jim Doak Kyle Herman
14	Asset Valuation	Detroit Windsor Tunnel	Retiree Committee	DR0043-A	All documents setting forth and/or listing the value of each City asset estimated to be worth more than \$5 million, and all documents explaining, discussing, describing, showing or analyzing the valuation and/or potential monetization of any City assets estimated by the City to be worth more than \$5 million, including but not limited to: (a) The Detroit Windsor Tunnel	Jim Doak Kyle Herman
15	Asset Valuation	DIA	Ambac	DR0053-A	All documents and communications that relate to the valuation and/or potential monetization, through sale, lease, or otherwise, of City-owned assets valued at more than \$5 million, including without limitation: A. Artwork owned or held in the Detroit Institute of Art, including relevant documentation relating to ownership or control of the artwork;	John Hill James Edwards James Naglick Eric Higgs David Whittaker Edward Keelean
16	Asset Valuation	DIA	Retiree Committee	DR0043-F	All documents setting forth and/or listing the value of each City asset estimated to be worth more than \$5 million, and all documents explaining, discussing, describing, showing or analyzing the valuation and/or potential monetization of any City assets estimated by the City to be worth more than \$5 million, including but not limited to: (f) the DIA Collection, the DIA Assets and/or any specific work of art at the DIA.	John Hill James Edwards James Naglick Eric Higgs David Whittaker Edward Keelean
17	Asset Valuation	Joe Louis Arena	Ambac	DR0053-F	All documents and communications that relate to the valuation and/or potential monetization, through sale, lease, or otherwise, of City-owned assets valued at more than \$5 million, including without limitation: F. Joe Louis Arena; and	Sonya Mays
18	Asset Valuation	Joe Louis Arena	Retiree Committee	DR0043-E	All documents setting forth and/or listing the value of each City asset estimated to be worth more than \$5 million, and all documents explaining, discussing, describing, showing or analyzing the valuation and/or potential monetization of any City assets estimated by the City to be worth more than \$5 million, including but not limited to: (e) Joe Louis Arena	Sonya Mays

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19	Asset Valuation	Monetization	Ambac	DR0053	All documents and communications that relate to the valuation and/or potential monetization, through sale, lease, or otherwise, of City-owned assets valued at more than \$5 million, including without limitation:	John Hill James Edwards James Naglick Eric Higgs David Whittaker Edward Keelean Kevin Hand James Doak Data Room Ernst & Young Kyle Herman Sonya Mays
20	Asset Valuation	Monetization	EEPK FMS WT FGIC	DR0100	100. All Documents and Communications concerning the valuation and/or monetization of City-owned assets valued at or more than \$1 million, including, without limitation, (a) artwork owned or held in the DIA, (b) Detroit-Windsor Tunnel, (c) the Veterans' Memorial Building, (d) City-owned parking facilities, (e) Coleman Young Airport, (f) Joe Louis Arena, (g) Belle Isle, and (h) City-owned land referenced in section VII.A.5(b) of the Disclosure Statement.	John Hill James Edwards James Naglick Eric Higgs David Whittaker Edward Keelean Kevin Hand James Doak Data Room Ernst & Young Kyle Herman Sonya Mays Carl Sekely
21	Asset Valuation	Monetization	Retirement Systems	DR0023	23. Produce all documents and communications that evidence or relate to the valuation and/or potential monetization initiatives, through sale, lease or otherwise, of City-owned assets valued in excess of \$5 million, including without limitation: (i) artwork owned or held in the DIA, other than the monetization efforts that relate to the potential DIA Settlement; (ii) the Detroit-Windsor Tunnel; (iii) the Veterans' Memorial Building; (iv) City-owned parking facilities; (v) Coleman A. Young Municipal Airport; (vi) Joe Louis Arena; and (vii) City-owned land referenced in the Disclosure Statement.	John Hill James Edwards James Naglick Eric Higgs David Whittaker Edward Keelean Kevin Hand James Doak Data Room Ernst & Young Kyle Herman Sonya Mays Carl Sekely
22	Asset Valuation	Monetization	Syncora	DR0036	All documents relating to any prior or potential sales of the City's assets in excess of \$1 million including, but not limited to, Belle Isle, the Detroit- Windsor Tunnel, the Veterans' Memorial Building, any City parking facilities, and Coleman Young Airport.	John Hill James Edwards James Naglick Eric Higgs David Whittaker Edward Keelean Kevin Hand James Doak Data Room Ernst & Young

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23	Asset Valuation	Monetization - Use of Proceeds	Retirement Systems	DR0024	24. Produce documents relating to the anticipated use of proceeds received from any monetization of City-owned assets valued in excess of \$5 million, including without limitation: (i) artwork owned or held in the DIA, other than the monetization efforts that relate to the potential DIA Settlement; (ii) the Detroit-Windsor Tunnel; (iii) the Veterans' Memorial Building; (iv) City-owned parking facilities; (v) Coleman A. Young Municipal Airport; (vi) Joe Louis Arena; and (vii) City-owned land referenced in the Disclosure Statement.	Kyle Herman James Doak
24	Asset Valuation	Parking	Ambac	DR0053-D	All documents and communications that relate to the valuation and/or potential monetization, through sale, lease, or otherwise, of City-owned assets valued at more than \$5 million, including without limitation: D. City-owned parking facilities;	Conway MacKenzie Carl Sekely
25	Asset Valuation	Parking	Retiree Committee	DR0061	All documents related to the Parking Bonds, the Parking Bond Documents and the Parking Bonds Claims, as defined and described in the Amended Disclosure Statement and the Amended Plan, and all documents explaining, discussing, describing, showing or analyzing the potential monetization of the assets constituting the Automobile Parking Fund, as described in section VII.A.4 of the Amended Disclosure Statement, including all communications between the City and Desman Associates.	Conway MacKenzie Carl Sekely
26	Asset Valuation	Veterans' Memorial Building	Ambac	DR0053-C	All documents and communications that relate to the valuation and/or potential monetization, through sale, lease, or otherwise, of City-owned assets valued at more than \$5 million, including without limitation: C. The Veterans' Memorial Building;	Kyle Herman Jim Doak
27	Assets	Essential for Government Services	EEPK FMS WT FGIC	DR0026	26. All Documents and Communications concerning which assets of the City are necessary for essential government services.	Kyle Herman
28	City Finances	Accounts Receivable	EEPK FMS WT FGIC	DR0070	70. All Documents and Communications concerning the Accounts Receivable, including, without limitation, (a) the category, (b) nature, (c) the amount of such accounts receivable, and (d) the collectability of such accounts receivable.	John Naglick Leighton Duncan Tony Clay Eric Higgs Michael Jamison
29	City Finances	Accounts Receivable	EEPK FMS WT FGIC	DR0071	71. All Documents and Communications concerning the status of the City's efforts to improve collection on the Accounts Receivable.	Leighton Duncan Kyle Herman Daniel Jerneycic
30	City Finances	Accounts Receivable	EEPK FMS WT FGIC	DR0072	72. All Documents and Communications concerning any contracts between the City and all collection agencies concerning the collection of Accounts Receivable.	Leighton Duncan Jeanette Rimmer
31	City Finances	Accounts Receivable	EEPK FMS WT FGIC	DR0073	73. All Documents and Communications concerning the value or collectability of the Accounts Receivable.	Rick Drumb
32	City Finances	Budgets	Syncora	DR0067	All City budgets from 2008 through the present.	Publicly Available - see City of Detroit website.
33	City Finances	Financial Statements	Syncora	DR0051	All Certified Audited Financial Reports.	Publicly Available - see City of Detroit website.
34	City Finances	Financial Statements	Syncora	DR0068	All City financial statements from 2008 through the present.	Publicly Available - see City of Detroit website.

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35	City Finances	Internal Controls	EEPK FMS WT FGIC	DR0118	All Documents and Communications concerning the City's efforts to address the material weaknesses cited in the 2012 auditor's management letter regarding internal controls for financial and accounting operations.	John Hill and Mark Lockridge - but the City is not aware of any responsive, non-privileged documents.
36	City Initiatives	Business Improvement Districts	EEPK FMS WT FGIC	DR0114	114. All Documents and Communications concerning the City's efforts to form Business Improvement Districts to generate revenue for, among other things, blight reduction, public safety, capital improvements, and/or "quality of life" issues.	Conway MacKenzie Sonya Mays
37	City of Detroit	Analysis of Bank's Role in Foreclosure Crisis	Sole	DR0024	24. Any and all studies by any department of the City of Detroit concerning the role of the banks in the City's foreclosure crisis for the years 2004 to the present.	Sonya Mays, but the City is not aware of any responsive, non-privileged documents.
38	City of Detroit	Analysis of LIBOR Fraud on City Finances	Sole	DR0025	25. Any and all studies by the City of Detroit in connection with the impact of Libor fraud by Bank of America, United Bank of Switzerland or any other financial institution on the City of Detroit's finances.	Sonya Mays, but the City is not aware of any responsive, non-privileged documents.
39	City of Detroit	Contact with Obama Administration	Sole	DR0022	22. Any and all documents, emails, correspondence, etc., between the City of Detroit and the Obama administration or any of its departments for the years 2012-2014.	Kevyn Orr Sonya Mays Conway MacKenzie
40	City of Detroit	Contact with Rating Agencies	Sole	DR0023	23. Any and all correspondence with Moody's, Standard and Poors, and Fitch Ratings Services, including emails from 2005 to the present.	Kevyn Orr Sonya Mays John Hill
41	City of Detroit	Labor - Number of Union Workers	Sole	DR0026	26. Any documents that establish the number of City of Detroit workers employed in union positions for each year from 2005 to the present, and the total amount in wages paid to the union employees for each year.	Data Room
42	Claims	Contracts Assumed or Rejected	Retiree Committee	DR0052	All reports, reviews or analyses, by Ernst & Young, or any other Person, concerning the modification of terms of Vendor Contracts, during the period from the beginning of the Prepetition Period to the present, and any actual or expected cost savings resulting therefrom.	Ernst & Young Conway MacKenzie Joseph Tiller
43	Claims	Contracts Assumed or Rejected	Retiree Committee	DR0053	All documents explaining, discussing, describing, showing or analyzing: (a) every contract and/or lease that is to be assumed or rejected under the Amended Plan, and/or (b) all contracts that the City has outsourced or may outsource in the future.	Ernst & Young Conway MacKenzie Joseph Tiller
44	Claims	Essential Vendor	Retiree Committee	DR0049	Documents sufficient to show: (a) the Identity of each vendor that the City has determined to be an essential vendor; (b) the total payments made to each essential vendor on account of Essential Vendor Claims and Administrative Claims; (c) the terms of trade with all essential vendors from the beginning of the Prepetition Period to the present; (d) all efforts by the City to obtain trade concessions or more advantageous terms from essential vendors; (e) the bidding for Vendor Contracts during the period from the beginning of the Prepetition Period to the present; (f) all modifications of Vendor Contract terms during the period from the beginning of the Prepetition Period to the present and all resulting actual or expected cost savings; (g) the assumption or rejection of any Vendor Contracts by the City, and the reasons for each such assumption or rejection; and (h) whether any amounts saved as a result of bidding on, or renegotiation or modification of Vendor Contracts were utilized or reflected in the reflected in the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement.	Joseph Tiller Ernst & Young

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45	Claims	Essential Vendor	Retiree Committee	DR0050	Documents showing the City's criteria or guidelines for determining essential vendors and all communications concerning the creation of such criteria and/or guidelines.	Joseph Tiller Ernst & Young
46	Claims	Essential Vendor	Retiree Committee	DR0051	All communications with vendors about their selection or non-selection as an essential vendor and/or the process for being selected an essential vendor.	Timothy Hoffman Ernst & Young
47	Claims	Judgments under Judicature Act	Syncora	DR0035	All documents relating to each judgment paid by the City under the Revised Judicature Act (MCL 600.93).	Edward Keelean and Kevin C. Richard, but the City is not aware of any responsive, non-privileged documents.
48	Claims	Plan Calculation - B Notes	EEPK FMS WT FGIC	DR0135	135. All Documents and Communications concerning the City's valuation of the New B Notes.	Amanda Van Dusen, but the City is not aware of any responsive, non-privileged documents.
49	Claims	Plan Calculation - B Notes	EEPK FMS WT FGIC	DR0136	136. All Documents and Communications concerning the present value of the New B Notes, including the discount rate used in connection with calculating such value.	Amanda Van Dusen, but the City is not aware of any responsive, non-privileged documents.
50	Claims	Plan Calculation - New B Notes	Retiree Committee	DR0039	All documents explaining, discussing, describing, showing or analyzing the sources of funds from which the "New B Notes" will be paid, the projected revenues from such sources and how those revenues are reflected in the Amended Plan.	Amanda Van Dusen, but the City is not aware of any responsive, non-privileged documents.
51	Claims	Plan Calculations	Retiree Committee	DR0038	All documents explaining, discussing, describing, showing or analyzing the City's formulation of the estimated recovery for each Class of Claims under the Amended Plan.	Ernst & Young
52	Claims	Release or Exculpation	DWSD Discovery Parties	DR0092	92. All Documents that relate to claims that is subject to a Release or Exculpation in the Plan, including Documents that relate to: (i) investigations into such claims; (ii) the potential liability to the City of any person or entity that would be entitled to Releases and Exculpations as proposed by the Plan; (iii) the potential liability to the City's creditors of any person or entity that would be entitled to Releases and Exculpations as proposed by the Plan; and (iv) any contribution to the City or to the City's debt adjustment efforts by any party to be provided a Release or Exculpation as proposed by the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
53	Claims	Release or Exculpation	Ambac	DR0019	All documents and communications that relate to the investigation by the City of any claim that is subject to a Release or Exculpation in the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
54	Claims	Release or Exculpation	Ambac	DR0020	All documents and communications that relate to the potential liability to the City of any person or entity that would be entitled to Releases and Exculpations as proposed by the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
55	Claims	Release or Exculpation	Ambac	DR0021	All documents and communications that relate to the potential liability to the City's creditors of any person or entity that would be entitled to Releases and Exculpations as proposed by the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
56	Claims	Release or Exculpation	Ambac	DR0022	All documents and communications relating to any potential liability of the City that would or could result from the imposition of liability on any person or entity for whom Releases and Exculpations are proposed by the Plan. Include in your response documents relating to any potential resulting claims against the City based on guaranty, indemnification, or contribution, or any other theory.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
57	Claims	Release or Exculpation	Ambac	DR0023	All documents and communications that relate to any contribution to the City or to the City's debt adjustment efforts by any party to be provided a Release or Exculpation as proposed by the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.

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58	Claims	Release or Exculpation	EEPK FMS WT FGIC	DR0162	162. All Documents and Communications concerning any claim that is subject to a release or exculpation in the Plan, including, without limitation, any claim held by the City or any creditors holding Pension Claims against the State of Michigan with respect to the State of Michigan's obligations concerning funding of any of the Pension Claims.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
59	Claims	Release or Exculpation	EEPK FMS WT FGIC	DR0163	163. All Documents and Communications concerning the potential liability to the City of any person or entity that would be entitled to a release or exculpation as proposed by the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
60	Claims	Release or Exculpation	Retiree Committee	DR0036	All documents explaining, discussing or analyzing the potential liability to the City or the City's creditors of any Person entitled to a Release under the Amended Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
61	Claims	Release or Exculpation	Retiree Committee	DR0037	All documents explaining, discussing or analyzing any contribution to the City or the City's restructuring efforts by any Person entitled to a Release under the Amended Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
62	Claims	Release or Exculpation	Retirement Systems	DR0041	41. Produce all documents and communications that relate to the investigation by the City of any claim that is subject to a Release or Exculpation in the Plan and all documents that relate to the potential liability to the City or the City's creditors of any person or entity that would be entitled to Releases and Exculpations as proposed by the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
63	Claims	Release or Exculpation	Retirement Systems	DR0042	42. Produce all documents relating to any potential liability of the City that would or could result from the imposition of liability on any person or entity for whom Releases and Exculpations are proposed by the Plan, including any documents related to potential claims based on guaranty, indemnification, contribution, or any other theory.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
64	Claims	Release or Exculpation	Retirement Systems	DR0043	43. Produce all documents that relate to the consideration provided by any party receiving a Release or Exculpation as proposed by the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
65	Claims	Sources of Recovery for Creditors	EEPK FMS WT FGIC	DR0025	25. All Documents and Communications regarding the City's potential sources of recovery for creditors.	Kyle Herman Jim Doak
66	Claims	Treatment	Ambac	DR0015	All documents and communications that relate to, support, or refute the basis for treating unsecured claims, including the GRS Claims and PFRS Claims, better than UTGO Claims and LTGO Claims under the Plan.	This is a legal issue that will be addressed in forthcoming legal briefs.
67	Claims	Treatment	EEPK FMS WT FGIC	DR0021	21. All Documents and Communications concerning the City's justification for treating GRS Pension Claims and PFRS Pension Claims differently than other Unsecured Claims.	This is a legal issue that will be addressed in forthcoming legal briefs.
68	Claims	Treatment	EEPK FMS WT FGIC	DR0125	125. All Documents and Communications that support or refute the basis for the City providing a higher percentage of recovery to holders of GRS Pension Claims and PFRS Pension Claim than to other holders of Unsecured Claims including holders of COP Claims.	This is a legal issue that will be addressed in forthcoming legal briefs.
69	Claims	Treatment	EEPK FMS WT FGIC	DR0126	126. All Documents and Communications concerning the City's decision to provide holders of GRS Pension Claims and PFRS Pension Claims recoveries in the form of Cash and to provide other holders of Unsecured Claims recoveries in the form of notes.	This is a legal issue that will be addressed in forthcoming legal briefs.

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70	Claims	Treatment	Macomb County	DR0028	All documents that reflect or relate to the basis for treating unsecured claims, including GRS and PFRS Claims, better than the UTGO Claims and LTGO Claims, including but not limited to any documents that reflect or relate to why that disparate treatment does not constitute unfair discrimination.	This is a legal issue that will be addressed in forthcoming legal briefs.
71	Claims -	Judgments under Judicature Act	Syncora	DR0034	All documents relating to each judgment against the City under the Revised Judicature Act (MCL 600.93).	Edward Keelean and Kevin C. Richard, but the City is not aware of any responsive, non-privileged documents.
72	Claims - Administrative	Amount	Ambac	DR0077	All documents that reflect the nature and amount of known or anticipated administrative claims.	Ernst & Young
73	Claims - Administrative	Amount	DWSD Discovery Parties	DR0081	81. All Documents reflecting the nature and amount of known or anticipated administrative claims.	Ernst & Young
74	Claims - Administrative		Retiree Committee	DR0047	All documents explaining, discussing or describing actual and anticipated Administrative Claims.	Ernst & Young
75	Claims - Bond Insurers	Treatment	DWSD Discovery Parties	DR0064	64. All Documents relating to the treatment of Claims of Bond Insurers, including Documents relating to: (i) claims for principal and interest due under the applicable bond documents, whether by subrogation, assignment or otherwise; and (ii) direct claims for contractual reimbursement of charges, fees, costs, losses, liabilities and expenses incurred by the Bond Insurers in connection with their respective insurance policies, reimbursement agreements and applicable bond	Ken Buckfire Jim Doak Kyle Herman Sanjay Marken
76	Claims - Classification	Communications	Ambac	DR0018	All communications between the City and any witness with respect to the classification of claims under the Plan.	Any communications with a witness/custodian are reflected in that particular witness/custodian's documents.
77	Claims - COPs	Amount of Recovery	Ambac	DR0029	All documents that reflect an estimate of the aggregate allowed amount of, and the recoveries on, the COP Claims and the basis for those estimates.	The City is not aware of any responsive, non-privileged documents.
78	Claims - COPs	Amount of Recovery	EEPK FMS WT FGIC	DR0119	119. All Documents and Communications concerning the City's estimate of the aggregate allowed amount of, and the recoveries on, the COP Claims and the basis for those estimates.	The City is not aware of any responsive, non-privileged documents.
79	Claims - COPs	Amount of Recovery	Retirement Systems	DR0028	28. Produce all documents that reflect an estimate of the aggregate allowed amount of, and the recoveries on, the COP Claims and the basis for those estimates.	The City is not aware of any responsive, non-privileged documents.
80	Claims - COPs	Amount of Recovery	Syncora	DR0059	All documents and communications relating to the City's analysis and estimate of recoveries for COPs under the Plan of Adjustment, including, but not limited to, the City's analyses and underlying assumptions.	The City is not aware of any responsive, non-privileged documents.
81	Claims - COPs	Communications with Service Corporation	Syncora	DR0062	All communications between the Service Corporations and the City.	James Edwards
82	Claims - COPs	Service Corporation Claims Against City	Syncora	DR0060	All documents and communications relating to any claims that the Service Corporations have against the City.	James Edwards, but the City is not aware of any responsive, non-privileged documents.
83	Claims - Downtown Development Authority	Downtown Development Authority	EEPK FMS WT FGIC	DR0129	129. All Documents and Communications concerning the basis of the classification and treatment of claims held by the Downtown Development Authority.	Joseph Tiller
84	Claims - Downtown Development Authority	Downtown Development Authority	EEPK FMS WT FGIC	DR0130	130. All Documents and Communications concerning all research and/or analysis conducted by or for the City related to the validity, enforceability, or potential impairment of the claims held by the Downtown Development Authority against the City.	Joseph Tiller

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85	Claims - Downtown Development Authority	Downtown Development Authority	Retiree Committee	DR0059	All documents and communications that reflect, support, or refute the validity of the claims held by the "Downtown Development Authority Claims" as defined in the Amended Plan.	Joseph Tiller
86	Claims - Downtown Development Authority	Treatment	Ambac	DR0017	All documents and communications that relate to the basis of the classification and treatment of claims held by the Downtown Development Authority.	Joseph Tiller
87	Claims - Downtown Development Authority	Validity	Ambac	DR0078	All documents and communications that reflect, support, or refute, the validity of the claims held by the Downtown Development Authority against the City.	Joseph Tiller
88	Claims - Downtown Development Authority	Validity	Ambac	DR0079	All documents and communications that reflect any research or analysis conducted by or for the City related to the validity, enforceability, or potential impairment of the claims held by the Downtown Development Authority against the City.	Joseph Tiller
89	Claims - Downtown Development Authority	Validity	Retirement Systems	DR0035	35. Produce all documents and communications that reflect, support or refute the validity of the claims held by the Downtown Development Authority against the City.	Joseph Tiller
90	Claims - Downtown Development Authority (DDA)		Ambac	DR0080	All documents that tend to support or refute that the Downtown Development Authority is an "insider" of the City as that term is defined in 11 U.S.C. § 101(31). The term "insider" includes— (A) if the debtor is an individual—(i) relative of the debtor or of a general partner of the debtor; (ii) partnership in which the debtor is a general partner; (iii) general partner of the debtor; or (iv) corporation of which the debtor is a director, officer, or person in control; (B) if the debtor is a corporation—(i) director of the debtor; (ii) officer of the debtor; (iii) person in control of the debtor; (iv) partnership in which the debtor is a general partner; (v) general partner of the debtor; or (vi) relative of a general partner, director, officer, or person in control of the debtor; (C) if the debtor is a partnership—(i) general partner in the debtor; (ii) relative of a general partner in, general partner of, or person in control of the debtor; (iii) partnership in which the debtor is a general partner; (iv) general partner of the debtor; or (v) person in control of the debtor; (D) if the debtor is a municipality, elected official of the debtor or relative of an elected official of the debtor; (E) affiliate, or insider of an affiliate as if such affiliate were the debtor; and (F) managing agent of the debtor.	Stacy Fox Conway MacKenzie Joseph Tiller
91	Claims - Limited Tax General Obligation Bonds	Plan Calculations	Ambac	DR0025	All documents and communications that relate to the City's derivation of its estimate of a 20% recovery under the Plan for the holders of Limited Tax General Obligation Bonds.	Ernst & Young
92	Claims - Limited Tax General Obligation Bonds	Plan Calculations	Retirement Systems	DR0029	29. Produce all documents and communications that relate to the City's derivation of its estimate of the recovery under the Plan for the holders of Limited Tax General Obligation Bonds.	Ernst & Young
93	Claims - Other Post Employment Benefits (OPEB)	ACA Impact	Dexia	DR0046	46. Documents sufficient to explain impact of implementation of Affordable Care Act on the calculation of and proposed treatment of the OPEB Claims under the Plan, including documents quantifying the value of the Affordable Care Act subsidies to be provided to employees under the Plan.	Milliman (expert discovery; production pending)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
94	Claims - Other Post Employment Benefits (OPEB)	Calculation of OPEB Liabilities	Retiree Committee	DR0030	All documents explaining, discussing or describing: (a) the actual participant valuation data consulted in calculating the OPEB liabilities referenced in Section VII.B.6 of the Amended Disclosure Statement, and (b) the mortality experience studies consulted, used, or referred to in calculating those OPEB liabilities.	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
95	Claims - Other Post Employment Benefits (OPEB)	Calculations	Macomb County	DR0020	REQUEST NO. 20: All documents that reflect the calculation of the GRS's OPEB Claims (as defined in the Plan) as reflected in the Amended Disclosure Statement and the Plan, including, without limitation, the underlying assumptions and methods used in the calculations.	Milliman (expert discovery; production pending)
96	Claims - Other Post Employment Benefits (OPEB)	Classification	EEPK FMS WT FGIC	DR0149	149. All Documents and Communications that support or refute the City's decision to classify OPEB allowable to active employees as a claim.	This is a legal issue that will be addressed in forthcoming legal briefs.
97	Claims - Other Post Employment Benefits (OPEB)	Data	Retiree Committee	DR0034	The most recent OPEB data available for active, retired, and terminated vested participants (including opt-outs).	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
98	Claims - Other Post Employment Benefits (OPEB)	Historical Reports	Dexia	DR0044	44. All OPEB medical and prescription reports for the period January 1, 2009 to present.	The City is not aware of any responsive, non-privileged documents.
99	Claims - Other Post Employment Benefits (OPEB)	Milliman 6/30/2012 Actuarial Valuation	Retiree Committee	DR0033	All documents containing information supporting Milliman's June 30, 2012 OPEB Actuarial Valuation including but not limited to: (a) the retiree data file as of February 1, 2013; (b) the mortality experience studies used as the basis for the mortality assumption; and (c) the claims and enrollment data used in the development of the per capita claims costs.	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
100	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Actuarial Valuation Reports	Dexia	DR0039	39. The June 30, 2013 actuarial valuation reports concerning OPEB and the actuarial data file relating thereto.	Milliman (expert discovery; production pending) and Data Room (for actuarial valuation reports). The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
101	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Documents Establishing Benefits	Dexia	DR0034	34. Copies of all collective bargaining agreements, benefit plans and associated summary plan descriptions that purport to establish OPEB benefits.	Orr (CBAs). Regarding benefit plans and SPDs, the City is not aware of any responsive, non-privileged documents.
102	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB)	Dexia	DR0041	41. Documents sufficient to establish OPEB medical and prescription retiree contribution amounts from June 30, 2011 to the present.	The City is not aware of any responsive, non-privileged documents.
103	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Historical Distributions	Dexia	DR0040	40. Year-by-year expenditure figures for distributions in respect of OPEB, for the years January 1, 2005 to present.	Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
104	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Milliman Communications	Dexia	DR0037	37. All communications from Milliman, Inc. to the City concerning OPEB Claims.	Milliman (expert discovery; production pending)
105	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Milliman Communications	Dexia	DR0038	38. All communications from the City to Milliman, Inc. concerning OPEB Claims.	Milliman (expert discovery; production pending)
106	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Milliman Documents	Dexia	DR0035	35. All documents (including all actuarial analyses, reports and letters referenced in the Amended Disclosure Statement) created by Milliman, Inc. concerning OPEB Claims - Other Post Employment Benefits (OPEB).	Milliman (expert discovery; production pending)
107	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Milliman Documents	Dexia	DR0036	36. All documents used by Milliman, Inc. in creating its actuarial analyses, reports and letters relating to OPEB Claims.	Milliman (expert discovery; production pending)
108	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Plan Calculations	Dexia	DR0032	32. All documents concerning the calculation of claims in class 12 of the Plan (OPEB Claims), including documents sufficient to explain the assumptions underlying the City's calculations.	Milliman (expert discovery; production pending)
109	Claims - Other Post Employment Benefits (OPEB)	Other Post Employment Benefits (OPEB) - Plan Calculations	Dexia	DR0033	33. All documents concerning the proposed treatment of claims in class 12 of the Plan, including documents sufficient to explain the City's calculation of estimated recovery percentages.	The City is not aware of any responsive, non-privileged documents.
110	Claims - Other Post Employment Benefits (OPEB)	Plan Calculation	Ambac	DR0001 2d	1. All documents and communications that relate to the calculation of the estimated \$3,184,900,000 amount of the OPEB liability described on page 25 of the Amended Disclosure Statement, dated March 31, 2014 [ECF No. 3382] (the "OPEB Claims Amount"). Include in your production work papers, valuation run results, sample calculations, and tally sheets.	Milliman (expert discovery; production pending)
111	Claims - Other Post Employment Benefits (OPEB)	Plan Calculation	Ambac	DR0002 2d	2. All documents and communications that relate to, or explain, the difference between the OPEB Claims Amount and the calculation of the estimated \$5.7 billion amount of the unfunded OPEB liability described on page 23 of the City's Proposal to Creditors, dated June 14, 2013. Include in your production work papers, valuation run results, sample calculations, and tally sheets.	Milliman (expert discovery; production pending)
112	Claims - Other Post Employment Benefits	Plan Calculation	Oakland	DR0016	16. Documents that reflect the calculation of the GRS' s OPEB Claims (as defined in the Plan) as reflected in the Disclosure Statement and the Plan, including, without limitation, the underlying assumptions and methods used in the calculations.	Milliman (expert discovery; production pending)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
113	Claims - Other Post Employment Benefits (OPEB)	Plan Calculation	Oakland	DR0017	17. Documents that reflect the total amount of the GRS's OPEB Claims paid or projected to be paid from the Petition Date to the Effective Date (as defined in the Plan).	Milliman (expert discovery; production pending)
114	Claims - Other Post Employment Benefits (OPEB)	Plan Calculations	Dexia	DR0045	45. Documents sufficient to explain the proposed changes to the City's OPEB benefits.	Data Room
115	Claims - Other Post Employment Benefits (OPEB)	Plan Calculations	EEPK FMS WT FGIC	DR0145	145. All Documents and Communications concerning the calculation of the OPEB Claims (both PFRS and GRS) reflected in the Disclosure Statement, the Plan, and any Plan Supplement, including, without limitation, the underlying assumptions and methods used in the calculations.	Milliman (expert discovery; production pending)
116	Claims - Other Post Employment Benefits (OPEB)	Plan Calculations	EEPK FMS WT FGIC	DR0146	146. All Documents and Communications reflecting the total amount of OPEB Claims (both PFRS and GRS) paid or projected to be paid from the Petition Date to the Effective Date.	Ernst & Young
117	Claims - Other Post Employment Benefits (OPEB)	Plan Calculations	Macomb County	DR0025	REQUEST NO. 25: All documents that reflect or relate to the manner in which the amount of the OPEB claims (both PFRS and GRS) reflected in the Plan and Amended Disclosure Statement were calculated, including but not limited to all documents that reflect or relate to the methods, assumptions or other bases used in making the calculations.	Milliman (expert discovery; production pending)
118	Claims - Other Post Employment Benefits	Projections	Dexia	DR0043	43. Year-by-year estimated expenditure figures under the Plan beyond 2023 for (i) salaries, OPEB payments, active pension plans, and DWSD revenue streams, and (ii) hypothetical retiree benefits.	Ernst & Young
119	Claims - Other Post Employment Benefits	Rate Increases	Dexia	DR0042	42. Documents sufficient to establish OPEB medical and prescription rate increases for the period January 1, 2005 to present.	The City is not aware of any responsive, non-privileged documents.
120	Claims - Other Post Employment Benefits (OPEB)	Retiree Population Affected	Dexia	DR0047	47. Documents concerning the retiree population affected by the proposed changes to OPEB Benefits, including: (i) the age and gender of those affected; (ii) whether they are active or retired; (iii) Medicare eligibility date; (iv) name of applicable OPEB Plan; and (v) the actuarial accrued liability attributable to each individual.	The City is not aware of any responsive, non-privileged documents.
121	Claims - Other Post Employment Benefits	VEBA Issues	Retiree Committee	DR0032	All documents describing, setting forth or analyzing the projected, estimated, or anticipated amount of Detroit VEBA administrative expenses, the basis and calculation of those expenses, and the intended source of funds to pay for such expenses.	The City is not aware of any responsive, non-privileged documents.
122	Claims - Other Post Employment Benefits (OPEB)	VEBA Issues	Retiree Committee	DR0031	All documents discussing or describing health care insurance policies, including but not limited to Medicare Advantage plans, that Debtor anticipates the Amended Plan's proposed Detroit VEBA would provide to Detroit VEBA Beneficiaries, their dependents, and future City retirees.	The City is not aware of any responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
123	Claims - Other Post-Employment Benefits (OPEB)	Claims Paid or Projected	Ambac	DR0072	All documents that reflect the total amount of OPEB Claims (both PFRS and GRS) paid or projected to be paid from the Petition Date to the Effective Date.	Milliman (expert discovery; production pending)
124	Claims - Other Post-Employment Benefits (OPEB)	Claims Paid or Projected	Syncora	DR0047	All analyses regarding the size of the OPEB Claim, as that term is defined in the Plan.	Milliman (expert discovery; production pending)
125	Claims - Other Post-Employment Benefits (OPEB)	Claims Paid or Projected	Syncora	DR0048	All analyses regarding the vesting of OPEB Benefits, as that term is defined in the Plan.	Milliman (expert discovery; production pending)
126	Claims - Other Post-Employment Benefits	Claims Paid or Projected	U.S. Bank	DR0023	Documents that reflect the calculation of the GRS's OPEB Claims (as defined in the Plan) as reflected in the Disclosure Statement and the Plan, including, without limitation, the underlying assumptions and methods used in the calculations.	Milliman (expert discovery; production pending)
127	Claims - Other Post-Employment	Claims Paid or Projected	U.S. Bank	DR0024	Documents that reflect the total amount of the GRS's OPEB Claims paid or projected to be paid from the Petition Date to the Effective Date (as defined in the Plan).	Milliman (expert discovery; production pending)
128	Claims - Other Post-Employment Benefits	Plan Calculations	Ambac	DR0071	All documents that reflect the calculation of the OPEB Claims (both PFRS and GRS) reflected in the Disclosure Statement and the Plan, including without limitation the underlying assumptions and methods used in the calculations.	Milliman (expert discovery; production pending)
129	Claims - Other Unsecured Claims	Aggregate Allowed Amount	Ambac	DR0030	All documents that reflect an estimate of the aggregate allowed amount of, and the recoveries on, Other Unsecured Claims, and the basis for that estimate.	Conway MacKenzie Publicly Available (Documents were exhibits at Eligibility trial or are in the docket)
130	Claims - Other Unsecured Claims	Other Unsecured Claims	EEPK FMS WT FGIC	DR0122	122. All Documents and Communications concerning the City's estimate of the aggregate allowed amount of, and recoveries on, Other Unsecured Claims, and the basis for such estimate.	Ernst & Young
131	Claims - Pension Fund	Milliman Documents	Retirement Systems	DR0014	14. Produce all documents, communications, analyses, memoranda, reports, models, studies or other information prepared by Milliman for the City in connection with this case and/or the Plan and Disclosure Statement.	Milliman (expert discovery; production pending)
132	Claims - Pension Funds	Accounts for Accrued Liability Funds	Dexia	DR0028	28. Documents sufficient to identify the accounts holding all Accrued Liability Funds held for GRS and/or PFRS pursuant to Section 47-2-18(d) of the City Code of Ordinances.	The City is not aware of any responsive, non-privileged documents.
133	Claims - Pension Funds	Actuarial Assumptions	Syncora	DR0057	For each plan's actuarial assumptions, all documents relating to (a) the annual salary increase assumption by age; (b) the probabilities of retirement by age for each benefit class; (c) the turnover rates by age, sex, and benefit class; and (d) disability rates by age.	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
134	Claims - Pension Funds	Actuarial Data	Retiree Committee	DR0029	All actuarial data consulted, used, or referred to in preparation of the Amended Plan and/or the exhibits thereto, or that underlie any actuarial determinations incorporated within the Amended Plan.	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
135	Claims - Pension Funds	Actuarial Data	Syncora	DR0056-A	56. All actuarial data for the following categories of individuals: a. Active Participants (i.e., those still accruing benefits). Actuarial data should include the following: i. Name, ii. Social Security Number, iii. Code identifying benefit structure applicable to participant, iv. Date of birth v. Date of hire, vi. Date of participation, vii. Gender, viii. Benefit service, ix. Vesting service, x. Ten-year compensation history for active participants, xi. Accrued benefits, xii. Employee contribution account balance, xiii. Employee contribution rate	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
136	Claims - Pension Funds	Actuarial Data	Syncora	DR0056-B	All actuarial data for the following categories of individuals: b. Termination Vested Participants and Active Participants with Frozen Benefits. Actuarial data should include the following: i. Name, ii. Social Security Number, iii. Code identifying benefit structure applicable to participant, iv. Date of birth, v. Date of hire, vi. Date of participation, vii. Date of termination, viii. Gender, ix. Accrued benefits, x. Vesting service, xi. Employee contribution account balance	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
137	Claims - Pension Funds	Actuarial Data	Syncora	DR0056-C	All actuarial data for the following categories of individuals: c. Retirees and Disabled Participants. Actuarial data should include the following: i. Name, ii. Social Security Number, iii. Code identifying benefit structure applicable to participant, iv. Date of birth, v. Gender, vi. Form of benefit, vii. Beneficiary date of birth (if form provides survivorship benefits)	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
138	Claims - Pension Funds	Actuarial Evaluations	Macomb County	DR0019	REQUEST NO. 19: All documents that reflect any update to June 30, 2013 (or beyond) of the actuarial valuations performed by Gabriel Roeder for the GRS as of June 30, 2012, based on or using the methods, assumptions, and procedures used by Gabriel Roeder.	Milliman (expert discovery; production pending)
139	Claims - Pension Funds	Actuarial Reports	Dexia	DR0031	31. The June 30, 2013 actuarial valuation reports concerning GRS and PFRS and the actuarial data file relating thereto.	Available at www.rscd.org (actuarial reports). The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
140	Claims - Pension Funds	Actuarial Reports	DWSD Discovery Parties	DR0006	6. All actuarial reports for the GRS pension plans and OPEB from January 1, 2009 to the present.	Data Room
141	Claims - Pension Funds	Actuarial Reports	DWSD Discovery Parties	DR0072	72. All Documents reflecting any update to the actuarial valuations performed by Gabriel Roeder Smith & Company ("Gabriel Roeder") for the PFRS and the GRS as of June 30, 2012, based on or using the methods, assumptions, and procedures used by Gabriel Roeder.	Milliman (expert discovery; production pending); Data Room
142	Claims - Pension Funds	Actuarial Reports	EEPK FMS WT FGIC	DR0156	156. All actuarial reports for each of GRS and PFRS from January 1, 2010 to present.	Available at www.rscd.org ; Data Room
143	Claims - Pension Funds	Actuarial Reports	Syncora	DR0050	All actuarial reports as of the last valuation date for each of the City's pension plans.	Available at www.rscd.org ; Data Room
144	Claims - Pension Funds	Actuarial Reports	U.S. Bank	DR0022	Documents that reflect any update to June 30, 2013 (or beyond) of the actuarial valuations performed by Gabriel Roeder for the GRS as of June 30, 2012, based on or using the methods, assumptions, and procedures used by Gabriel Roeder.	Milliman (expert discovery; production pending)
145	Claims - Pension Funds	Actuarial Reports - Experience	EEPK FMS WT FGIC	DR0150	150. The experience analysis covering the period July 1, 2002 through July 30, 2007 referenced in the GRS Actuarial Report of June 30, 2011.	Data Room

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
146	Claims - Pension Funds	Actuarial Reports - Milliman Underlying Documents	Dexia	DR0007	7. All documents utilized by Milliman, Inc. in creating its actuarial analyses, reports and letters concerning PFRS and GRS Pension Claims.	Milliman (expert discovery; production pending); Data Room
147	Claims - Pension Funds	Actuarial Standards	Ambac	DR0006 2d	6. All documents and communications that relate to the City's compliance with Actuarial Standards of Practice ("ASOP") 4 (Measuring Pension Obligations) and ASOP 41 (Actuarial Communications) in preparing and disclosing to any party the City's Assumed Rates of	Milliman (expert discovery; production pending)
148	Claims - Pension Funds	Actuarial Valuations	Oakland	DR0015	15. Documents that reflect any update to June 30, 2013 (or beyond) of the actuarial valuations performed by Gabriel Roeder for the GRS as of June 30, 2012, based on or using the methods, assumptions, and procedures used by Gabriel Roeder.	Milliman (expert discovery; production pending)
149	Claims - Pension Funds	Annuity Savings Fund Recoupment	Retirement Systems	DR0018	18. Produce all documents that relate to the Annuity Savings Fund recoupment proposed in the Plan, including documents relating to the ASF Recoupment Percentage and the ASF Distribution Recipient(s).	Milliman (expert discovery; production pending)
150	Claims - Pension Funds	ASF Recoupment Percentage	Dexia	DR0025	25. Documents sufficient to calculate the ASF Recoupment Percentage.	Ernst & Young
151	Claims - Pension Funds	Asset Market Value	Dexia	DR0013	13. All documents reflecting the estimated or actual current market value of PFRS and GRS assets, including: (i) All documents updating the actuarial valuations performed by Gabriel Roeder for the PFRS and the GRS as of June 30, 2012; and (ii) All Pension Statements of Plan Net Assets and Statement of Changes in Plan Net Assets from July 1, 2013 to present.	Available at www.rscd.org; Data Room
152	Claims - Pension Funds	Asset Market Value	DWSD Discovery Parties	DR0073	73. All Documents that reflect the estimated or actual current market value of PFRS and GRS assets.	Available at www.rscd.org; Data Room
153	Claims - Pension Funds	Contributions	Ambac	DR0065	All documents reflecting the City's annual contributions to the PFRS and GRS pension plans from 2004 to the present.	Ernst & Young; Milliman (expert discovery; production pending)
154	Claims - Pension Funds	Contributions	Ambac	DR0066	All documents reflecting the City's projected annual contributions to the PFRS and GRS for retirement benefits following the confirmation of the Plan through December 31, 2034, based on the actuarial assumptions used by the PFRS and GRS, respectively, prior to the Petition Date.	Ernst & Young; Milliman (expert discovery; production pending)
155	Claims - Pension Funds	Contributions	Ambac	DR0067	All documents reflecting the City's projected annual contributions to the PFRS and GRS for retirement benefits following the confirmation of the Plan through December 31, 2034, based on the actuarial assumptions used by the City in formulating the Plan of Adjustment and taking into account the restructuring of the pension obligations proposed in the Plan.	Ernst & Young; Milliman (expert discovery; production pending)
156	Claims - Pension Funds	Contributions	EEPK FMS WT FGIC	DR0140	140. All Documents and Communications concerning the City's annual contributions to the PFRS and GRS pension plans from 2004 to present.	Ernst & Young; Milliman (expert discovery; production pending)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
157	Claims - Pension Funds	COPs Support	Syncora	DR0069	All documents, minutes, communications, testimony, presentations, or other records that relate to the DPFRS's or the DGRS's decision to support the COPs transactions.	The DPFRS or DGRS may have responsive documents; the City is not aware of any responsive, non-privileged documents.
158	Claims - Pension Funds	Current Market Value	Ambac	DR0069	All documents that reflect the estimated or actual current market value of PFRS and GRS assets.	Available at www.rscd.org; Data Room
159	Claims - Pension Funds	Current Market Value	U.S. Bank	DR0021	Documents that reflect the estimated or actual current market value of GRS assets.	Available at www.rscd.org; Data Room
160	Claims - Pension Funds	Deferred Retirement Option Plans	Syncora	DR0058	The value of any deferred retirement option plans ("DROP") account balances.	The City is not aware of any responsive, non-privileged documents.
161	Claims - Pension Funds	Design Studies	Syncora	DR0054	Any plan design studies, including reports, letters, and presentations, that relate to the City's pension plans that were conducted between January 1, 2008 and the present.	Milliman (expert discovery; production pending)
162	Claims - Pension Funds	Detroit Library Commission	UAW	DR0001	Any and all documents concerning correspondence between you and the DLC during or any time after December 2012 concerning either (1) pension benefits of active DLC employees or retired former DLC employees or (2) pension contributions made on behalf of active DLC employees or retired former DLC employees.	Detroit Public Library
163	Claims - Pension Funds	Disability Audit	Dexia	DR0021	21. All disability audits concerning GRS and PFRS for the period January 1, 2005 to present.	The City is not aware of any responsive, non-privileged documents.
164	Claims - Pension Funds	Disability Audits	EEPK FMS WT FGIC	DR0147	147. All disability audits for PFRS and GRS.	The City is not aware of any responsive, non-privileged documents.
165	Claims - Pension Funds	Disgorgement of COPs Proceeds	EEPK FMS WT FGIC	DR0158	158. All Documents and Communications concerning and related to a potential successful claim against the GRS and the PFRS to disgorge the proceeds received in connection with the 2005 and 2006 COPs transactions.	The City is not aware of any responsive, non-privileged documents.
166	Claims - Pension Funds	Disgorgement of COPs Proceeds	EEPK FMS WT FGIC	DR0159	159. All Documents and Communications concerning the estimated UAAL for the GRS and the PFRS, assuming the GRS and the PFRS are required to disgorge any or all proceeds received in connection with the 2005 and 2006 COPs transactions.	The City is not aware of any responsive, non-privileged documents.
167	Claims - Pension Funds	Disgorgement of COPs Proceeds	EEPK FMS WT FGIC	DR0160	160. All Documents and Communications concerning the estimated percentage recoveries for each Class of Unsecured Claims, assuming the GRS and the PFRS are required to disgorge any or all proceeds received in connection with the 2005 and 2006 COPs transactions.	No responsive, non-privileged documents were produced.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
168	Claims - Pension Funds	Disgorgement of COPs Proceeds	EEPK FMS WT FGIC	DR0161	161. All Documents and Communications concerning how the City fund the UAAL of the GRS and the PRFS in the event the GRS and the PFRS are required to disgorge any or all of the proceeds received in connection with the 2005 and 2006 COPs transactions.	No responsive, non-privileged documents were produced.
169	Claims - Pension Funds	Documents Provided to Employees Re PFRS or GRS	Dexia	DR0005	5. Documents provided by the City to current and former City employees describing or explaining their PFRS or GRS pension benefits.	Available at www.rscd.org
170	Claims - Pension Funds	DWSD	Macomb County	DR0014	REQUEST NO. 14: All documents relating to the amount of DWSD's pension liabilities, including all documents reflecting information that would justify \$675 million (or any other amount) of projected pension payments over the next 10 years.	Milliman (expert discovery; production pending)
171	Claims - Pension Funds	DWSD	Macomb County	DR0015	REQUEST NO. 15: All documents evidencing the calculation and allocation of all pension, other postemployment benefits, and any Certificates of Participation-related payments assessed against the systems historically and that are projected through any projection period under the Plan.	Milliman (expert discovery; production pending)
172	Claims - Pension Funds	DWSD	Macomb County	DR0016	REQUEST NO. 16: All documents relating to the treatment of DWSD's pension liabilities under each of the DWSD options, including but not limited to (i) any documents reflecting such treatment and (ii) any analyses conducted relating to such treatment.	Milliman (expert discovery; production pending)
173	Claims - Pension Funds	DWSD	Macomb County	DR0026	REQUEST NO. 26: All documents that reflect or relate to the treatment of pensions of DWSD employees and retirees as compared to all other members of the GRS, including but not limited to all documents that describe the manner in which the pensions of DWSD employees and retirees are treated as compared to all other members of the GRS.	The City is not aware of any responsive, non-privileged documents.
174	Claims - Pension Funds	DWSD	Oakland	DR0013	13. Documents evincing the calculation and allocation of all pension, other postemployment benefits, and any Certificates of Participation-related payments assessed against the Systems historically and that are projected through any projection period under the Plan.	The City is not aware of any responsive, non-privileged documents.
175	Claims - Pension Funds	DWSD	Retiree Association	DR0044	44. All documents explaining, discussing, describing, showing or analyzing, in the event of any transaction described in Request No. 43 above: (a) the transfer and amount of GRS pension assets associated with DWSD employees and retirees to another entity, (b) the assumption and amount of liabilities associated with such a transfer of assets, and (c) the value to be paid to retirees on account of GRS Claims (as defined in the Amended Plan), including OPEB Claims.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
176	Claims - Pension Funds	DWSD	Retiree Association	DR0051	51. All documents reflecting, showing or discussing the calculations underlying the schedules set forth on Exhibit L to the Amended Disclosure Statement, including but not limited to the calculation of pension payments from DWSD to the GRS from 2014 to 2023.	Conway MacKenzie

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
177	Claims - Pension Funds	DWSD	Retiree Committee	DR0026	All documents explaining, discussing, describing, showing or analyzing: (a) the transfer and amount of GRS pension assets associated with DWSD employees and retirees to another entity or the assumption of liabilities associated with such transfer in the event of the DWSD Transaction, and (b) the value to be paid to retirees on account of GRS Claims (as defined in the Amended Plan), including OPEB claims, in the event of a	Milliman (expert discovery; production pending)
178	Claims - Pension Funds	DWSD Payments	DWSD Discovery Parties	DR0016	16. All Documents relating to the \$675,000,0002 in "pension-related payments" to be received by the City from the Systems if the Debtor does not enter into any DWSD Transaction, including all Documents relating to: (i) whether the Systems will have the cash flow to make such payments; (ii) the allocation of such amounts to the Systems; (iii) any prefunding or acceleration of the Systems' payment of such amounts; and (iv) the pro forma impact on rates and the potential impact of higher rates on wholesale contract renewals.	Supplemental Review/Production Currently Underway (Regarding GLWA)
179	Claims - Pension Funds	DWSD Share	Retiree Committee	DR0005	All documents explaining, discussing or describing the DWSD's full allocable share of the UAAL and plan assets of the GRS as of June 30, 2013, and any date subsequent hereto. For each such date, produce all documents explaining, discussing or describing: (a) the rate of return or valuation used to calculate such UAAL and GRS plan assets, (b) the DWSD's full allocable share thereof, and (c) other assumptions utilized in the calculations.	Milliman (expert discovery; production pending)
180	Claims - Pension Funds	DWSD Share	Retiree Committee	DR0006	All documents explaining, discussing or describing the assumption that "DWSD will accelerate, or prefund, the majority of its full allocable share of the GRS UAAL ..." as set forth at page 11 of the Amended Disclosure Statement with respect to the Amended Plan, including all documents: (a) discussing or analyzing the legality of such prefunding or acceleration, and/or (b) that set forth the specifics of prefunding including the timing and amount of each payment to be made.	This is a legal issue that will be addressed in forthcoming legal briefs.
181	Claims - Pension Funds	Employee Handbooks	Syncora	DR0055	All of the currently operative employee handbooks and summaries relating to each of the City's pension plans.	The City is not aware of any responsive, non-privileged documents.
182	Claims - Pension Funds	Esuchanko Report (3/8/2011)	EEPK FMS WT FGIC	DR0157	157. The Report of Joseph Esuchanko dated March 8, 2011, including all exhibits and attachments thereto.	Conway Mackenzie - Charles Moore
183	Claims - Pension Funds	Experience Study	EEPK FMS WT FGIC	DR0151	151. The most recent experience study for each of GRS and PFRS.	Data Room
184	Claims - Pension Funds	Experience Study	Syncora	DR0053	The most recent experience study relating to the City's pension plans.	Data Room
185	Claims - Pension Funds	Financial	Retiree Committee	DR0007	All documents explaining, discussing or describing for each of the GRS and PFRS, respectively, the amounts or estimated amounts as of June 30, 2013, or any date thereafter, of: (a) total accrued pension liabilities, (b) pension fund balances, (c) unfunded accrued pension liabilities, (d) actuarial accrued liabilities, (e) accrued assets, (f) UAAL and/or (g) the market value of assets in the GRS and PFRS.	Milliman (expert discovery; production pending); Data Room

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
186	Claims - Pension Funds	Gabriel Roeder Smith & Company	Ambac	DR0070	All documents that reflect any update to June 30, 2013 (or beyond) of the actuarial valuations performed by Gabriel Roeder Smith & Company ("Gabriel Roeder") for the PFRS and the GRS as of June 30, 2012, based on or using the methods, assumptions, and procedures used by Gabriel Roeder.	Milliman (expert discovery; production pending)
187	Claims - Pension Funds	Governing Documents	Syncora	DR0052	All of the documents governing each of the City's pension plans, including, but not limited to, any amendments or statutes governing each of the City's pension plans.	Available at www.rscd.org; Data Room
188	Claims - Pension Funds	GRS Accrued Liability Fund	EEPK FMS WT FGIC	DR0152	152. All Documents and Communications concerning the GRS Accrued Liability Fund, including all Documents and Communications concerning (a) the balance of such fund from inception to date, (b) withdrawals from such fund, and (c) how the amounts in such fund factor into recoveries under the Plan.	The City is not aware of any responsive, non-privileged documents.
189	Claims - Pension Funds	Hardship Fund for Pensioners	Retirement Systems	DR0009	9. Produce all documents relating to the Hardship Fund for Pensioners, as described in Section II.A.2(c) of the Disclosure Statement, including all communications between the City, the State, and/or other third-parties, draft state or local legislation, term sheets including drafts thereof, and all documents setting forth the terms on which pensioners may become eligible for additional benefits and how additional benefits will be allocated.	Milliman (expert discovery; production pending)
190	Claims - Pension Funds	Historical Accounting and Financial	Dexia	DR0030	30. All legal, accounting and financial opinions concerning Pension Claims since January 1, 2004, including all drafts, final versions and communications related thereto.	The City is not aware of any responsive, non-privileged documents.
192	Claims - Pension Funds	Historical City Contributions	DWSD Discovery Parties	DR0075	75. All Documents reflecting the City's contributions to the PFRS and GRS pension plans from 2004 to the present.	Available at www.rscd.org; Data Room
191	Claims - Pension Funds	Historical Distributions	Dexia	DR0020	20. Year-by-year expenditure figures for distributions to GRS and PFRS beneficiaries for the years January 1, 2005 to present.	Available at www.rscd.org; Ernst & Young
193	Claims - Pension Funds	Historical Pension Plan Trustees	Dexia	DR0027	27. Documents sufficient to identify the Trustees of GRS and PFRS and the tenure of each trustee for the period January 1, 2005 to present.	Available at www.rscd.org
194	Claims - Pension Funds	Hybrid Formula	Ambac	DR0068	All documents and communications that relate to the GRS Hybrid Pension Formula and the PFRS Hybrid Pension Formula, including documents and communications that reflect the analysis conducted to derive those formulas, and the figures and results such formulas may yield.	Milliman (expert discovery; production pending)
195	Claims - Pension Funds	Hybrid Formula	EEPK FMS WT FGIC	DR0143	143. All Documents and Communications concerning the GRS Hybrid Pension Formula and the PFRS Hybrid Pension Formula, including, without limitation, (a) documents and communications that reflect the analysis conducted to derive those formulas, and (b) the figures and results such formulas may yield.	Milliman (expert discovery; production pending)
196	Claims - Pension Funds	Hybrid Formula	Macomb County	DR0024	REQUEST NO. 24: All documents that reflect or relate to the PFRS Hybrid Pension Formula and the GRS Hybrid Pension Formula, including but not limited to all documents that relate or refer to the manner in which the formulas were devised.	Milliman (expert discovery; production pending)
197	Claims - Pension Funds	Hybrid Formula	Retirement Systems	DR0020	20. Produce all documents and communications that relate to the GRS Hybrid Pension Formula and the PFRS Hybrid Pension Formula, including documents and communications that reflect the analysis conducted to derive those formulas, and the figures and results such formulas may yield.	Milliman (expert discovery; production pending)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
198	Claims - Pension Funds	Hybrid Pension Formula	DWSD Discovery Parties	DR0074	74. All Documents that relate to the GRS Hybrid Pension Formula and the PFRS Hybrid Pension Formula, including Documents that reflect the analysis conducted to derive those formulas, and the figures and results such formulas may yield.	Milliman (expert discovery; production pending)
199	Claims - Pension Funds	Hybrid Pension Plan	Dexia	DR0022	22. All documents concerning the PFRS Hybrid Pension Plan and the GRS Hybrid Pension Plan.	Milliman (expert discovery; production pending)
200	Claims - Pension Funds	Hybrid Pension Plan	Dexia	DR0023	23. Documents sufficient to calculate the amount and value of all payments to be made to Active Employees under the GRS Hybrid Pension Formula and PFRS Hybrid Pension Formula.	Milliman (expert discovery; production pending)
201	Claims - Pension Funds	Hybrid Pension Plan	Dexia	DR0024	24. Documents sufficient to calculate the amount of Pension Claims or UAAL that corresponds to the payments to be made to Active Employees under the GRS Hybrid Pension Formula and PFRS Hybrid Pension Formula.	Milliman (expert discovery; production pending)
202	Claims - Pension Funds	Investigations	DWSD Discovery Parties	DR0024	24. All Documents relating to any criminal or regulatory investigation or proceedings, or threatened proceedings, pertaining to the operations of the Systems or the GRS.	The City is not aware of any responsive, non-privileged documents.
203	Claims - Pension Funds	Milliman - Documents Provided to or Produced by a Third Party	Dexia	DR0012	12. The actuarial valuation data and reports either written by or provided to Milliman, Inc. concerning the June 30, 2013 valuation used to calculate PFRS and GRS Pension Claims and any updates thereto.	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
204	Claims - Pension Funds	Milliman - Communications	Dexia	DR0008	8. All communications from Milliman, Inc. to the City concerning PFRS and GRS Pension Claims.	Milliman (expert discovery; production pending)
205	Claims - Pension Funds	Milliman - Communications	Dexia	DR0009	9. All communications from the City to Milliman, Inc. concerning PFRS and GRS Pension Claims.	Milliman (expert discovery; production pending)
206	Claims - Pension Funds	Milliman Communications	EEPK FMS WT FGIC	DR0154	154. All Documents and Communications exchanged with Milliman, Inc., from January 1, 2010 to present.	Milliman (expert discovery; production pending)
207	Claims - Pension Funds	Milliman Documents	EEPK FMS WT FGIC	DR0155	155. All Documents prepared by Milliman, Inc., from January 1, 2010 to present.	Milliman (expert discovery; production pending)
208	Claims - Pension Funds	Milliman Documents Referenced in Disclosure Statement	Dexia	DR0006	6. All documents referenced in the Disclosure Statement created by Milliman, Inc. concerning PFRS and GRS Pension Claims, including all actuarial analyses, reports and letters.	Milliman (expert discovery; production pending); Data Room
209	Claims - Pension Funds	Millimen	Syncora	DR0049	All documents, communications, and data exchanged with Milliman in 2013.	The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
210	Claims - Pension Funds	Payment to "Most In Need"	Retiree Committee	DR0008	All documents explaining, discussing or describing additional payments that might be made to certain retirees "who are most in need" as referenced on page 15 of the Amended Disclosure Statement, including documents explaining, discussing or describing: (a) the criteria for determining whether a person is eligible to receive such additional payment, (b) the amounts of the State PFRS Consideration and State GRS Consideration, as applicable, that are expected to be allocable to such additional payments, (c) how the City will determine what additional payments will be paid in individual cases, (d) the timing and amounts of such payments, and (e) whether such additional payments are only available to retirees who vote to accept the Plan.	Milliman (expert discovery; production pending)
211	Claims - Pension Funds	Pension Plan Provisions	Dexia	DR0026	26. Documents setting forth all current PFRS and GRS pension plan provisions.	The City is not aware of any responsive, non-privileged documents. (The Retirement Systems have responsive documents)
212	Claims - Pension Funds	Pension Task Force	Retirement Systems	DR0021	21. Produce all documents and communications from the Pension Task Force.	No responsive, non-privileged documents were produced.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
213	Claims - Pension Funds	PFRS Accrued Liability Fund	EEPK FMS WT FGIC	DR0153	153. All Documents and Communications concerning the PFRS Accrued Liability Fund, including all documents and communications concerning (a) the balance of such fund from inception to date, (b) withdrawals from such fund, and (c) how the amounts in such fund factor into recoveries under the Plan.	Available at www.rscd.org
214	Claims - Pension Funds	Plan Calculation	Retirement Systems	DR0016	16. Produce all documents that relate to the calculation of the PFRS Pension Claims and the GRS Pension Claims reflected in the Disclosure Statement and the Plan, including without limitation the underlying assumptions and methods used in the calculations.	Milliman (expert discovery; production pending)
215	Claims - Pension Funds	Plan Calculation - Restoration Payment	Retirement Systems	DR0017	17. Produce all documents that relate to the PFRS Restoration Payment and the GRS Restoration Payment.	Milliman (expert discovery; production pending)
216	Claims - Pension Funds	Plan Calculation; Actuarial Assumptions	Retirement Systems	DR0011	11. Produce all documents underlying the actuarial assumptions and treatment of pension benefits and Pension Claims in Plan, including all documents prepared or relied upon by Milliman and/or the City.	Milliman (expert discovery; production pending)
217	Claims - Pension Funds	Plan Calculations	Ambac	DR0064	All documents that relate to the calculation of the PFRS Claims and GRS Claims reflected in the Disclosure Statement and the Plan, including without limitation the underlying assumptions and methods used in the calculations	Milliman (expert discovery; production pending)
218	Claims - Pension Funds	Plan Calculations	Dexia	DR0001	1. All documents concerning the calculation of claims in classes 10 and 11 of the Plan (PFRS and GRS Pension Claims), including documents sufficient to explain the assumptions and methods underlying the City's calculations.	Milliman (expert discovery; production pending); Data Room
219	Claims - Pension Funds	Plan Calculations	Dexia	DR0002	2. All documents concerning the proposed treatment of claims in classes 10 and 11 of the Plan (PFRS and GRS Pension Claims), including documents sufficient to explain the City's calculation of estimated recovery percentages in each class.	Milliman (expert discovery; production pending); Data Room
220	Claims - Pension Funds	Plan Calculations	Dexia	DR0004	4. For each Retirement System, documents sufficient to explain and calculate the following components of the City's UAAL calculation: (i) UAAL associated with accrued benefits as of the date of estimation; (ii) UAAL associated with Future Benefits; and (iii) of the Future Benefits, the amount of the UAAL that corresponds to future pay increases and how much corresponds to future service.	Milliman (expert discovery; production pending); Data Room
221	Claims - Pension Funds	Plan Calculations	Dexia	DR0014	14. Documents sufficient to explain the basis for the calculation of the proposed 6% - 14% reduction in current and monthly pension payments for PFRS beneficiaries.	Milliman (expert discovery; production pending); Data Room
222	Claims - Pension Funds	Plan Calculations	Dexia	DR0015	15. Documents sufficient to explain the basis for the calculation of the proposed 26% - 34% reduction in current and monthly pension payments for GRS beneficiaries.	Milliman (expert discovery; production pending); Data Room
223	Claims - Pension Funds	Plan Calculations	Dexia	DR0016	16. Documents sufficient to explain the calculation contained in the Disclosure Statement that the elimination of COLA will result in a loss of 18% of the value of PFRS benefits and 13% of the value of GRS benefits.	The City is not aware of any responsive, non-privileged documents.
224	Claims - Pension Funds	Plan Calculations	Dexia	DR0017	17. For each Retirement System, all documents used to calculate the amount of Current Accrued Annual Pension.	Milliman (expert discovery; production pending); Data Room
225	Claims - Pension Funds	Plan Calculations	Dexia	DR0018	18. For each Retirement System, documents sufficient to calculate the aggregate amount of Pension Claims and UAAL, if different, corresponding to frozen pension benefits.	Milliman (expert discovery; production pending); Data Room
226	Claims - Pension Funds	Plan Calculations	Dexia	DR0019	19. For each Retirement System, documents sufficient to calculate the aggregate amount of Pension Claims and UAAL that will be satisfied by the payment of the Adjusted Pension Amount.	Milliman (expert discovery; production pending); Data Room

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
227	Claims - Pension Funds	Plan Calculations	DWSD Discovery Parties	DR0070	70. All Documents relating to the GRS claims in the Disclosure Statement and Plan, including the amount of the claims, and their calculation (underlying assumptions and methods used in the calculation).	Milliman (expert discovery; production pending); Data Room
228	Claims - Pension Funds	Plan Calculations	DWSD Discovery Parties	DR0071	71. All Documents relating to the PFRS claims in the Disclosure Statement and Plan, including the amount of the claims, and their calculation (underlying assumptions and methods used in the calculation).	Milliman (expert discovery; production pending); Data Room
229	Claims - Pension Funds	Plan Calculations	EEPK FMS WT FGIC	DR0123	123. All Documents and Communications concerning the City's estimate of the aggregate allowed amount of, and recoveries on, the GRS Pension Claims, and the basis for such estimate.	Milliman (expert discovery; production pending); Data Room
230	Claims - Pension Funds	Plan Calculations	EEPK FMS WT FGIC	DR0124	124. All Documents and Communications concerning the City's estimate of the aggregate allowed amount of, and recoveries on, the PFRS Pension Claims, and the basis for such estimate.	Milliman (expert discovery; production pending); Data Room
231	Claims - Pension Funds	Plan Calculations	Macomb County	DR0023	REQUEST NO. 23: All documents that reflect or relate to the manner in which the amount of the PFRS and GRS pension claims reflected in the Plan and Amended Disclosure Statement were calculated, including any documents that reflect any methods, assumptions or bases used in making the	Milliman (expert discovery; production pending)
232	Claims - Pension Funds	Plan Calculations	Retiree Committee	DR0011 [Appears twice]	All documents constituting, evidencing or reflecting communications between the City and any actual or potential witness concerning the actual or potential treatment of GRS Claims, PFRS Claims and/or OPEB Claims under the Amended Plan.	Milliman (expert discovery; production pending)
233	Claims - Pension Funds	Plan Calculations	Retiree Committee	DR0012	All documents showing, reflecting or analyzing the reduction in payments to holders of GRS Pension Claims and PFRS Pension Claims as a result of the elimination of the cost of living adjustment that will be implemented under the Amended Plan.	Milliman (expert discovery; production pending)
234	Claims - Pension Funds	Plan Calculations	Retiree Committee	DR0015	All documents discussing or explaining the methodology by which (a) excess allocations to Annuity Savings Fund Accounts will be applied to reduce Annuity Savings Fund Accounts or Current Accrued Annual Pensions amounts, (b) GRS Adjusted Pension Amounts will be increased to take into account such reductions, as referred to in Section II.B.3.u.ii.D of the Amended Plan, and/or (c) details on a retiree-by-retiree basis on the application of the formula.	Milliman (expert discovery; production pending)
235	Claims - Pension Funds	Plan Calculations	Retiree Committee	DR0016	All documents discussing or explaining how the amount of any GRS or PFRS Restoration Payment is to be determined, and any parameters or guidelines that the trustees of the GRS or PFRS, as applicable, may or will be required to follow in setting the size of any such Payments.	The City is not aware of any responsive, non-privileged documents.
236	Claims - Pension Funds	Projected Contributions	DWSD Discovery Parties	DR0076	76. All Documents reflecting the City's projected contributions to the PFRS and GRS pension plans through December 31, 2034 based on any actuarial assumption.	Milliman (expert discovery; production pending); Ernst & Young
237	Claims - Pension Funds	Projected Contributions	EEPK FMS WT FGIC	DR0141	141. All Documents and Communications concerning the City's projected annual contributions to the PFRS and GRS for retirement benefits following confirmation of the Plan through December 31, 2034, based on the actuarial assumptions used by the PFRS and GRS, respectively, before the Petition Date.	Milliman (expert discovery; production pending); Ernst & Young
238	Claims - Pension Funds	Projected Contributions	EEPK FMS WT FGIC	DR0142	142. All Documents and Communications concerning the City's projected annual contributions to the PFRS and GRS for retirement benefits following confirmation of the Plan through December 31, 2034, based on the actuarial assumptions used by the City in formulating the Plan.	Milliman (expert discovery; production pending); Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
239	Claims - Pension Funds	Projected Contributions	EEPK FMS WT FGIC	DR0144	144. All Documents and Communications concerning the sources of funding for the City's projected annual contributions to the PFRS and GRS pursuant to the Plan, assuming the DIA Settlement does not occur and/or the full amount of the DIA Settlement proceeds or the State Contribution is not received.	Ernst & Young
240	Claims - Pension Funds	Projected Contributions	Macomb County	DR0022	REQUEST NO. 22: All documents that reflect or relate to the City's projected required annual contributions to the GRS or PFRS for the period January 1, 2012 through December 31, 2034, including but not limited to: i. all documents that reflect the actuarial assumptions used by GRS and PFRS prior to the Petition Date; and ii. all documents that reflect the actuarial assumptions used by the City in formulating the Plan of Adjustment and taking into account the restructuring of the pension obligations proposed in the Plan.	Milliman (expert discovery; production pending); Ernst & Young
241	Claims - Pension Funds	Projections	Retirement Systems	DR0015	15. Produce all documents and analyses relating to whether the PFRS or the GRS will have a funding level of more than 80% by June 30, 2023, and how such additional funding will affect the estimated percentage recoveries for pension claims in Classes 10 and 11.	Milliman (expert discovery; production pending)
242	Claims - Pension Funds	Projections - Annual Contributions	Retirement Systems	DR0019	19. Produce all documents reflecting the City's projected annual contributions to the PFRS and the GRS following confirmation of the Plan through December 31, 2054, based on the actuarial assumptions used by the City in formulating the Plan and taking into account the restructuring of the pension obligations as proposed in the Plan.	Milliman (expert discovery; production pending); Ernst & Young
243	Claims - Pension Funds	Rate of Return	Dexia	DR0003	3. Document sufficient to explain the assumptions and methods underlying the City's calculation of the Retirement System's UAAL, including the assumed rates of return on fund assets of 6.5% for PFRS and 6.25% for GRS.	The City is not aware of any responsive, non-privileged documents.
244	Claims - Pension Funds	Rate of Return	Dexia	DR0010	10. Documents sufficient to disclose the range and frequency of rates of return used by Milliman, Inc. in pension calculations for municipalities other than the City.	Milliman (expert discovery; production pending); Data Room
245	Claims - Pension Funds	Rate of Return	EEPK FMS WT FGIC	DR0148	148. All Documents and Communications concerning the basis for using a 6.25% discount rate for GRS, and a 6.50% discount rate for PFRS, including, without limitation, all assumptions made by the City in formulating these discount rates, and any other information supporting or refuting such rates.	The City is not aware of any responsive, non-privileged documents.
246	Claims - Pension Funds	Rate of Return	Retiree Committee	DR0001	All documents explaining, discussing or describing the rate of return, discount rate or other assumptions, "as of" date and method of calculation used to calculate the aggregate allowance amounts for the PFRS Pension Claims, the GRS Pension Claims and the OPEB Claims, as indicated on pages 32-35 of the Amended Plan.	Milliman (expert discovery; production pending); Data Room
247	Claims - Pension Funds	Rate of Return	Retiree Committee	DR0002	All documents explaining, discussing or describing the reasons for the City's selection of 6.5% and 6.25% as the maximum assumed rate of investment return and discount rate for purposes of determining the assets and liabilities of the GRS and PFRS, respectively, during the period that ends on June 30, 2023, as referred to in Sections II.B.3.t.ii.B and II.B.3.u.ii.B of the Amended Plan.	The City is not aware of any responsive, non-privileged documents.
248	Claims - Pension Funds	Rate of Return	Retiree Committee	DR0017	All documents discussing or referring to any assumed rate of investment return or discount rate that the City plans to use, or anticipates or contemplates using, for purposes of determining the assets and liabilities of the GRS and PFRS, respectively, at any time after June 30, 2023.	The City is not aware of any responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
249	Claims - Pension Funds	Rate of Return	Retirement Systems	DR0012	12. Produce all documents relating to the return on investment assumptions proposed by the City under the Plan, including all documents relating to the frequency with which the return rates being urged by the City are used by other public employee retirement systems, and the propriety of adopting the return on investment assumptions proposed by the City under the Plan.	Milliman (expert discovery; production pending)
250	Claims - Pension Funds	Rate of Return	Retirement Systems	DR0013	13. Produce all documents evidencing the City's right to set the discount rates and return on investment assumptions for the PFRS and the GRS.	This is a legal issue that will be addressed in forthcoming legal briefs.
251	Claims - Pension Funds	Rate of Return - Historical Actual and Assumed	Dexia	DR0029	29. Documents setting forth the actual and assumed annual return on assets of PFRS and GRS for the period January 1, 1991 to the present.	Data Room; see also www.rscd.org
252	Claims - Pension Funds	Rates of Return	Ambac	DR0005 2d	5. All documents and communications that relate to the City's Assumed Rates of Return, including work papers, valuation run results, sample calculations, and tally sheets.	Milliman (expert discovery; production pending)
253	Claims - Pension Funds	State Communications	Dexia	DR0011	11. All communications between or among the City, GRS, PFRS, the Retiree Committee, the Governor of the State of Michigan, the Attorney General of the State of Michigan, any labor union, or any other party, and/or the representatives and/or agents thereof, concerning (i) the calculation and allowance of PFRS and GRS Pension Claims, and (ii) the proposed treatment of PFRS and GRS Pension Claims under the Plan.	Milliman (expert discovery; production pending)
254	Claims - Pension Funds	Tax Qualification Status	Dexia	DR0048	48. All legal, actuarial or financial opinions related to the tax qualifications of GRS and PFRS.	The City is not aware of any responsive, non-privileged documents.
255	Claims - Pension Funds	Valuation of GRS Assets	Oakland	DR0014	14. Documents that reflect the estimated or actual current market value of GRS assets.	Available at www.rscd.org
256	Claims - Pension Funds		EEPK FMS WT FGIC	DR0083	83. All Documents and Communications concerning the authority and ability of the DWSD to prefund its allocable share of the GRS UAAL to the GRS.	Ernst & Young
257	Claims - Pension Funds		EEPK FMS WT FGIC	DR0084	84. All Documents and Communications concerning any necessary approvals for the DWSD to prefund its allocable share of the GRS UAAL to the GRS.	Supplemental Review/Production Currently Underway (Regarding GLWA)
258	Claims - Pension Funds		EEPK FMS WT FGIC	DR0085	85. All Documents and Communications concerning the estimated percentage recoveries for each Class of Unsecured Claims, assuming no amounts are received on an accelerated basis from DWSD for its portion of the GRS UAAL.	Milliman (expert discovery; production pending); Data Room
259	Claims - Pension Funds		Syncora	DR0046	All documents and communications relating to the City's claim that the DGRS and DPFRS understated their UAAL.	Milliman (expert discovery; production pending); Data Room
260	Claims - Pension Funds and Other Post-Employment Benefits	Classification	Ambac	DR0016	All documents and communications that relate to the basis for the classification of (A) PFRS Pension Claims in the same class with OPEB Claims held by holders of PFRS Pension Claims and (B) GRS Pension Claims in the same class with OPEB Claims held by holders of GRS Pension Claims.	Not Applicable (reclassified - see Dkt. 3085)
261	Claims - Pension Funds and Other Post-Employment Benefits	DWSD	U.S. Bank	DR0020	Documents evincing the calculation and allocation of all pension, other postemployment benefits, and any Certificates of Participation-related payments assessed against the Systems historically and that are projected through any projection period under the Plan.	Milliman (expert discovery; production pending); Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
262	Claims - Pension Funds and Other Post Employment Benefits	Historical Allocation of Pension and OPEB Expenses	DWSD Discovery Parties	DR0005	5. All Documents reflecting the historical allocation of pension and OPEB expenses and liabilities to the Systems and to the City from January 1, 2009 to the present, including the actual pension contributions and OPEB cash flows for the Systems and the City.	The City is not aware of any responsive, non-privileged documents.
263	Claims - Pension Funds and Other Post Employment Benefits (OPEB)	Projected Pension and OPEB Expenses	DWSD Discovery Parties	DR0017a-c	17. All Documents relating to the calculation of the projected pension and OPEB expenses for the Systems, including: a. Projection of pension and OPEB liabilities, assets, expenses and cash flows for the Systems; b. If the pension and OPEB expenses are allocated from the City's pension and OPEB expenses, the basis for such allocation; c. Actuarial assumptions and methods employed in the projection of pension expenses, including expected asset returns, asset smoothing methods, unfunded liability amortization methods, future payroll growth, and new hire assumptions;	Available at www.rscd.org; Data Room
264	Claims - Pension Funds and Other Post Employment Benefits (OPEB)	Projected Pension and OPEB Expenses	DWSD Discovery Parties	DR0017d-f	17. All Documents relating to the calculation of the projected pension and OPEB expenses for the Systems, including: d. Plan provisions reflected in the pension and OPEB projection, both for the legacy benefits (for example, if any benefit reduction is assumed) and for ongoing accrual (for example, the DB or DC formula for current employees and new hires); e. The amount of pension assets and liabilities allocated to the Systems from the GRS and a description of the methodology used in such allocation; and f. The latest pension and OPEB actuarial valuation census data (both active employees and retirees) for the Systems.	Available at www.rscd.org (FAQs address legacy benefits); Data Room. The actuarial data requested is replete with confidential and highly personal information regarding retirees. It was provided to Milliman by the Retirement Systems for a limited purpose and on the condition that Milliman not release it to any third party.
265	Claims - Unlimited Tax General Obligation Bonds	Millage Calculation	Ambac	DR0034	All documents that reflect the process for setting the millage collected on account of unlimited tax general obligation bonds for each year from 2004 to the present, including documents and communications that relate to the amount to be collected under the millage, the assessment of the values of real property subject to the millage, and any adjustments made for delinquencies or anticipated delinquencies.	Amanda VanDusen James Doak Juan Santambrogio Kyle Herman Daniel Jerneycic
266	Claims - Unlimited Tax General Obligation Bonds	Millage Calculation	Ambac	DR0034	All documents that reflect the process for setting the millage collected on account of unlimited tax general obligation bonds for each year from 2004 to the present, including documents and communications that relate to the amount to be collected under the millage, the assessment of the values of real property subject to the millage, and any adjustments made for delinquencies or anticipated delinquencies.	Amanda VanDusen James Doak Juan Santambrogio Kyle Herman Daniel Jerneycic
267	Claims - Unlimited Tax General Obligation Bonds	Settlement	Retirement Systems	DR0030	30. Produce all documents relating to the UTGO settlement announced on April 9, 2014 through the Statement of Detroit Bankruptcy Mediators, including all term sheets, communications, and draft settlement agreements.	The City does not believe that it has responsive, non-privileged documents.
268	Claims - Unlimited Tax General Obligation Bonds		Ambac	DR0011	Documents and communications relating to the effect on the City's post-confirmation cash flow in the event the City is prohibited from using millage levied on real property above the applicable statutory, constitutional or chapter limits for purposes other than paying unlimited tax general obligations.	Not applicable. The Plan of Adjustment does not contemplate this.
269	Claims - Unlimited Tax General Obligation Bonds		Ambac	DR0026	All documents and communications that relate to the City's derivation of its estimated recovery under the Plan for the holders of Unlimited Tax General Obligation Bonds.	Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
270	Claims - Unlimited Tax General Obligation Bonds		Ambac	DR0031	All documents that relate to the terms of the Plan UTGO Notes, including the type of security/bond, the methodology proposed for calculation of the present value of the payment stream, and the source of payment for the Plan UTGO Notes.	Not applicable. The Fourth Amended Plan does not contemplate the issuance of Plan UTGO Notes.
271	Claims - Unsecured Claims	Plan Calculations	EEPK FMS WT FGIC	DR0131	131. All Documents and Communications concerning the City's calculations of the estimated percentage recoveries for each Class of Unsecured Claims.	Ernst & Young
272	Credit Rating		Ambac	DR0099	Documents sufficient to establish the City's credit rating between January 1, 2005 and present.	Publicly Available John Hill Kevyn Orr Sonya Mays
273	Credit Rating		Retiree Committee	DR0048	All documents explaining, discussing or describing the City's credit rating between January 1, 2005 to the present, including the effect of the Amended Plan on the City's credit rating.	Publicly Available John Hill Kevyn Orr Sonya Mays
274	Detroit Institute of Art	Art Commission	EEPK FMS WT FGIC	DR0051	51. All inventories compiled and/or received by the City's Arts Commission, including any inventories compiled pursuant to section F(2)(4) of the 1997 Operating Agreement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
275	Detroit Institute of Art	Attendance	EEPK FMS WT FGIC	DR0059	59. All Documents and Communications concerning audience, participation and/or visitor logs or surveys relating to the DIA.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
276	Detroit Institute of Art	Attendance	EEPK FMS WT FGIC	DR0060	60. All Documents and Communications concerning attendance at the DIA.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
277	Detroit Institute of Art	Attendance	Syncora	DR0015	Documents sufficient to show the attendance at DIA Corp. on a yearly and monthly basis.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
278	Detroit Institute of Art	Attendance	Syncora	DR0016	Documents sufficient to show the attendance at special exhibits or demonstrations held by DIA Corp.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
279	Detroit Institute of Art	Bill of Sale from 1919	EEPK FMS WT FGIC	DR0033	33. The "bill of sale for all of the art collection of the Detroit Museum of Arts" that is described in the Report by Councilman Nagel at 1783, Journal of the Common Council, 18 November 1919, and which the Controller for the City of Detroit "filed . . . for record," as described in the Report by the Controller at 1885, Journal of the Common Council, 16 December 1919.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
280	Detroit Institute of Art	Charitable Trust	EEPK FMS WT FGIC	DR0054	54. All Documents and Communications concerning the registration of any object or work of art in the Collection as being held in charitable trust.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
281	Detroit Institute of Art	Charitable Trust	Syncora	DR0027	All documents and communications relating to the registration of any object or work of art in the Collection, or any object or work of art previously owned or held by DIA Corp., the City, or the Founders Society, as a charitable trust.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
282	Detroit Institute of Art	Christies	Retiree Association	DR0019	19. All memoranda or communications prepared by an employee, agent, officer, or representative of Debtor or the Emergency Manager regarding Christie's evaluation of and report regarding the DIA and/or its assets and/or holdings.	John Naglick
283	Detroit Institute of Art	Christies	Retiree Association	DR0020	20. All communications to or from Christie's, or any entity or individual working with or for Christie's, about the DIA, the DIA artwork, and/or Christie's evaluation and/or appraisal of the DIA art.	John Naglick

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
284	Detroit Institute of Art	Christies	Retiree Association	DR0021	21. All documents provided to or from Christie's, or any entity or individual working with or for Christie's, in connection with its evaluation and/or appraisal of the DIA art, including any draft reports, appraisals or evaluations. All communications with any entity or individual other than Christie's about the performance of a potential appraisal of the DIA art.	John Naglick
285	Detroit Institute of Art	Christies	Syncora	DR0019	All documents relating to the Christie's valuation.	Kenneth Buckfire John Naglick
286	Detroit Institute of Art	Christies	Syncora	DR0020	All external and internal communications relating to the Christie's Valuation, including, but not limited to, communications with Christie's, DIA Corp., the Foundations, or the Attorney General.	Kenneth Buckfire John Naglick
287	Detroit Institute of Art	Christie's	Retirement Systems	DR0004v-vi	4. With respect to the DIA, produce the following: v. all communications between the City and Christie's, any and all engagement letters, underlying documents exchanged between the City and Christie's, all documents relied upon in connection with Christie's appraisal, and the curriculum vitae of the individual(s) who conducted the Christie's appraisal; vi. all instruments transferring art to the DIA, documents evidencing the City's purchase of art, any documents evidencing ownership interests in the art, or reflecting the City's possessory or ownership interest in the DIA art, including documents that may reflect restrictions on the transfer or sale of the DIA art;	John Naglick
288	Detroit Institute of Art	Collections Management Policy	EEPK FMS WT FGIC	DR0049	49. The Collections Management Policy.	James Edwards
289	Detroit Institute of Art	Collections Management Policy	Syncora	DR0012	The Collections Management Policy.	James Edwards
290	Detroit Institute of Art	Commissioned Art	Syncora	DR0005	Documents sufficient to identify any work of art in the Collection that was commissioned by the DIA Corp., the Founders Society, or the City.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
291	Detroit Institute of Art	Communications with Michigan Attorney General	Syncora	DR0010	All documents, communications, and notifications sent to or received from the Attorney General that relate to the deaccession, sale, auction, exchange, or disposal of any object or work of art by DIA Corp., the Founders Society, or the City.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
292	Detroit Institute of Art	Communications with Michigan Attorney General	Syncora	DR0024	All documents and communications relating to Attorney General Opinion No. 7272.	John Naglick James Edwards
293	Detroit Institute of Art	Court Filings	Syncora	DR0028	Any and all petitions or other court filings that relate to the deaccession, sale, auction, exchange, loan or other disposition of any object or work of art in the Collection or that was previously owned or held by DIA Corp., the City, or the Founders Society.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
294	Detroit Institute of Art	DIA Settlement or Grand Bargain	Ambac	DR0062	All documents and communications that relate to the DIA Settlement, including documents and communications that reflect the likelihood that the DIA settlement will occur, the terms of the DIA Settlement, the negotiation of those terms, the participants in the negotiations, what other settlement terms were considered, and why those terms were	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
295	Detroit Institute of Art	DIA Settlement or Grand Bargain	DWSD Discovery Parties	DR0063	63. All Documents concerning the impact on the feasibility of the Plan and creditor recoveries under the Plan in the event the full amounts of the State GRS Consideration and/or the State PFRS Consideration are not received.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
296	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0035	35. All Documents and Communications concerning the DIA Settlement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
297	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0037	37. All Documents and Communications concerning the status of the DIA Settlement, including, without limitation, the status of (a) the Foundations' commitments, (b) the commitment by DIA Corp., (c) the City's efforts to obtain all necessary approvals, and (d) efforts to satisfy all conditions precedent to the Foundations' commitments, including the affirmation by County authorities of certain existing funding obligations with respect to DIA Corp and the approval of the DIA Settlement by the Attorney General for the State.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
298	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0038	38. All Documents and Communications concerning the risks associated with the execution of effectiveness of the DIA Settlement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
299	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0039	39. All Documents and Communications concerning the claims and issues to be resolved pursuant to the DIA Settlement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
300	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0040	40. All Documents and Communications concerning the strengths and weaknesses of the issues to be resolved pursuant to the DIA Settlement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
301	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0041	41. All Documents and Communications concerning the City's assessment of why the DIA Settlement is reasonable.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
302	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0042	42. All Documents and Communications concerning the projected recoveries for each Class of Unsecured Claims, assuming the DIA Settlement does not become effective.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
303	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0043	43. All Documents and Communications concerning the treatment of the Collection if the DIA Settlement is not consummated.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
304	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0044	44. All Documents and Communications concerning the present value of the DIA Settlement Proceeds.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
305	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0055	55. All Documents and Communications evidencing the DIA Settlement, including, without limitation, the documents to be attached to the Plan as Exhibit I.A.80.	Other than what is publicly available, after inquiry to John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, the City does not believe it has responsive, non-privileged documents.
306	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0063	63. All Documents and Communications concerning the State Contribution Agreement.	Other than what is publicly available, after inquiry to John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, the City does not believe it has responsive, non-privileged documents.
307	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0064	64. All Documents and Communications concerning the State Settlement Benefit Amount.	Other than what is publicly available, after inquiry to John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, the City does not believe it has responsive, non-privileged documents.
308	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0065	65. All Documents and Communications concerning any approvals by any branch of the government of the State of Michigan required for the State Contribution Agreement to become effective, including the status of and any risks associated with obtaining such approvals.	Other than what is publicly available, after inquiry to John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, the City does not believe it has responsive, non-privileged documents.
309	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0066	66. All Documents and Communications concerning the status of, and any risks associated with, the fulfillment of any of the conditions to effectiveness of the State Contribution Agreement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
310	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0067	67. All Documents and Communications concerning the estimated percentage recoveries to each Class of Unsecured Claims, assuming the State Contribution Agreement does not become effective and/or the full amount of the State Contribution is not received.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
311	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0068	68. All Documents and Communications concerning the present value of the State Contribution Amount.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
312	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0069	69. All Documents and Communications concerning the claims against the State and State Related Entities that will be released pursuant to Section III.D.7.b of the Plan if the State Contribution Agreement is consummated.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
313	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0127	127. All Documents and Communications concerning the City's decision to provide proceeds from the DIA Settlement solely to holders of PFRS Pension Claims and GRS Pension Claims.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
314	Detroit Institute of Art	DIA Settlement or Grand Bargain	EEPK FMS WT FGIC	DR0128	128. All Documents and Communications concerning the City's decision to provide proceeds from the State Contribution Agreement solely to holders of PFRS Pension Claims and GRS Pension Claims.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
315	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retiree Association	DR0023	23. All memoranda and communications prepared by an employee, agent, officer, or representative of Debtor or the Emergency Manager regarding the DIA Settlement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
316	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retiree Committee	DR0003	All documents explaining, discussing or describing the calculation, derivation and/or rationale for the contributions and/or payments to be made by or from the DIA Proceeds, the DWSB, the State Contribution Agreement, and/or the City, as referred to in Section II.B.3.t.ii.A and Section II.B.3.u.ii.A of the Amended Plan.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
317	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retiree Committee	DR0004	With respect to the payments and/or contributions from the DIA Proceeds, the DWSB, the State Contribution Agreement and/or the City, all documents explaining, discussing or describing: (a) the payment schedule, including timing and amounts of each specific contribution, and/or (b) the obligations of those parties to make those payments or contributions.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
318	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retiree Committee	DR0009	The DIA Settlement Documents, as referred to in Section I.A.79 of the Amended Plan and all documents reflecting, discussing or analyzing the amount of consideration to be paid in connection with the DIA Settlement (as such term is defined in Section I.A.79 of the Amended Plan).	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
319	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retiree Committee	DR0010	All documents explaining, discussing or describing the effect on payments to holders of GRS Pension Claims and PFRS Pension Claims if any one or more of the DIA Settlement or the State Contribution Agreement is not consummated, including the specific reductions in claim payment amounts resulting therefrom.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
320	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retiree Committee	DR0045	All documents constituting, explaining or discussing the Asset Transfer between the City and the DIA, including but not limited to the documents pursuant to which the Asset Transfer was effectuated, including the bill of sale.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
321	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retirement Systems	DR0005	5. With respect to the DIA Settlement, produce the DIA Settlement Documents and any drafts thereof; drafts of terms sheets; copies of the City's agreement with the Foundations; draft agreements; and, all related communications.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
322	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retirement Systems	DR0006	6. With respect to the DIA Corp.'s pledge to fund \$100 million to the DIA Settlement, produce all communications, proposed term sheets, drafts of terms sheets, draft agreements evidencing the DIA Corp.'s pledge or commitment for the funding, and all documents demonstrating how much, if any, has been raised to date.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
323	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retirement Systems	DR0008	8. With respect to the State Contribution, produce all communications between the City, the State, and/or other third-parties, draft state legislation, required terms, conditions for approval, governance terms, documents relating to the poverty level analysis, and all documents regarding how the funds will be allocated.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
324	Detroit Institute of Art	DIA Settlement or Grand Bargain	Retirement Systems	DR0010	10. Produce all documents and communications between the City and the State of Michigan relating to the Plan, the Disclosure Statement, the DIA Settlement, and the State Contribution.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
325	Detroit Institute of Art	DIA Settlement or Grand Bargain	Syncora	DR0025	All documents and communications relating to the Plan GRS Settlement, as that term is defined in the Plan.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
326	Detroit Institute of Art	DIA Settlement or Grand Bargain	Syncora	DR0026	All documents and communications relating to the Plan PFRS Settlement, as that term is defined in the Plan.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
327	Detroit Institute of Art	DIA Settlement or Grand Bargain	Syncora	DR0029	All governing documents that relate to the DIA Settlement, including, but not limited to, those documents that will be attached to the Plan as Exhibit I.A.71.	Other than what is publicly available, after inquiry to John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, the City does not believe it has responsive, non-privileged documents.
328	Detroit Institute of Art	DIA Settlement or Grand Bargain	Syncora	DR0030	All communications relating to the DIA Settlement, including, but not limited to, all communications with the Foundations, the DGRS, the DPFRS, the State, DIA Corp., or the Community Foundation for Southeast Michigan relating to the DIA Settlement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
329	Detroit Institute of Art	DIA Settlement or Grand Bargain	Syncora	DR0031	All documents and communications that relate to the transfer of the Collection to DIA Corp. pursuant to the DIA Settlement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
330	Detroit Institute of Art	DIA Settlement or Grand Bargain	Syncora	DR0032	All documents and communications that relate to any alternative efforts to realize any value for the "DIA Assets," as defined by the Plan, or the Collection, aside from the DIA Settlement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
331	Detroit Institute of Art	DIA Settlement or Grand Bargain - Alternatives	EEPK FMS WT FGIC	DR0036	36. All Documents and Communications concerning (a) the potential monetization of the artwork held at the DIA other than pursuant to the DIA Settlement (including, without limitation, offers to purchase or finance or lease or expressions of interest in purchasing or financing or leasing the artwork), (b) the potential or estimated revenue from such monetization, and (c) the reasons why such monetization has not been pursued by the City.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
332	Detroit Institute of Art	DIA Settlement or Grand Bargain - Plan GRS Settlement or State Contribution Agreement	Ambac	DR0059	All documents and communications that relate to the Plan GRS Settlement, including documents and communications that reflect the terms of the Plan GRS Settlement, the negotiation of those terms, the participants in the negotiations, what other settlement terms were considered, and why those terms were rejected.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
333	Detroit Institute of Art	DIA Settlement or Grand Bargain - Plan PFRS Settlement or State Contribution	Ambac	DR0060	All documents and communications that relate to the Plan PFRS Settlement, including documents and communications that reflect the terms of the Plan PFRS Settlement, the negotiation of those terms, the participants in the negotiations, what other settlement terms were considered, and why those terms were rejected.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
334	Detroit Institute of Art	DMA	EEPK FMS WT FGIC	DR0029	29. All Documents and Communications evidencing the conveyance(s) of the assets of the DMA to the City, pursuant to Michigan Public Act 67 of 1919 and section 7(c) of the Detroit City Charter of 1918, including, without limitation, all contracts, deeds, City Council minutes, and Art Commission records effecting, authorizing, ratifying, and/or describing such conveyance(s).	James Edwards

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
335	Detroit Institute of Art	DMA	Syncora	DR0002	All documents and communications relating to the conveyance of the DMA assets from the DMA to the City of Detroit in 1919, including, but not limited to, contracts, deeds, and other DMA records.	James Edwards
336	Detroit Institute of Art	Financial Statements	EEPK FMS WT FGIC	DR0048	48. The annually prepared financial statements, whether audited or unaudited, for the DIA Corp.	James Edwards John Naglick
337	Detroit Institute of Art	Insurance	EEPK FMS WT FGIC	DR0062	62. All insurance policies relating to the Collection from 1997 to present.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
338	Detroit Institute of Art	Insurance	Syncora	DR0021	All past and current insurance policies that relate to the Collection, including, but not limited to, all insurance policies obtained by DIA Corp. pursuant to sections F(15)(a) and (b) of the 1997 Operating Agreement.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
339	Detroit Institute of Art	Insurance; Christies	EEPK FMS WT FGIC	DR0053	53. All Documents and Communications concerning the value of the Collection or any part thereof, including the following: a. any and all insurance policies (including documentation of applicable coverage limits) currently held by the City, DMA, or DIA Corp. in connection the Collection (or any part thereof), including, without limitation, any and all insurance policies obtained by DIA Corp. pursuant to sections F(15)(a) and (b) of the 1997 Operating Agreement; and b. all Documents and Communications concerning work performed on behalf of the City or DIA Corp. by Christie's, including the basis for the scope of Christie's appraisal of the Collection.	John Hill James Edwards James Naglick Eric Higgs David Whittaker Edward Keelean
340	Detroit Institute of Art	Interest in Sales	Syncora	DR0006	All documents and communications relating to the deaccession, sale, exchange, auction, or disposal of any object or work of art held or owned by DIA Corp., the Founders Society, or the City, including, but not limited to, all documents and communications relating to any indications of interest in bidding on any pieces in the Collection if they were sold or offered for sale.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
341	Detroit Institute of Art	Interest in Sales	Syncora	DR0007	All communications that the City (including its advisors and investment bankers) had with any individuals, investors, art collectors, or corporations relating to the sale or purchase of the Collection or any pieces in the Collection.	Not Applicable
342	Detroit Institute of Art	Inventory	Retiree Committee	DR0046	All lists, inventories and other documents identifying, setting forth, and/or itemizing each of the works of art in the DIA Collection and the value of each work.	John Naglick
343	Detroit Institute of Art	Inventory	Syncora	DR0001	All inventories created in the past five years of the objects and works of art in the Collection.	John Naglick
344	Detroit Institute of Art	Inventory; Insurance; Valuation	Retirement Systems	DR0004i-iv	4. With respect to the DIA, produce the following: i. a schedule or inventory of all of the artwork (the entire collection, not just the portion appraised by Christie's); ii. all insurance policies and renewal policies related to the art issued within the last 10 years, and any appraisals or valuations performed in connection with the issuance of said policies; iii. any appraisals (other than the one performed by Christie's) performed at any time for any particular piece or portion of the DIA collection within the last 10 years;	John Naglick
345	Detroit Institute of Art	Membership	EEPK FMS WT FGIC	DR0061	61. All Documents and Communications concerning membership of the DIA Corp.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
346	Detroit Institute of Art	Membership	Syncora	DR0017	Documents sufficient to show all past and present members of DIA Corp.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
347	Detroit Institute of Art	Minutes of Board of Trustees from 1919	EEPK FMS WT FGIC	DR0034	34. The Minutes from the Detroit Museum of Art's Board of Trustees meeting, dated September 12, 1919.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
348	Detroit Institute of Art	Monetization	Retiree Association	DR0022	22. All documents and communications concerning the potential maximization of the value of the DIA art, including the potential sale of any of that art.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
349	Detroit Institute of Art	Operating Agreement	EEPK FMS WT FGIC	DR0045	45. The 1997 Operating Agreement.	James Edwards
350	Detroit Institute of Art	Operating Agreement	EEPK FMS WT FGIC	DR0046	46. All Documents and Communications concerning the operational relationship between the City and DIA Corp. concerning the Museum or the Collection.	James Edwards
351	Detroit Institute of Art	Operating Agreement	EEPK FMS WT FGIC	DR0047	47. All Documents and Communications concerning the operational relationship between the City and the Founder's Society concerning the Museum or the Collection.	James Edwards
352	Detroit Institute of Art	Operating Agreement	Syncora	DR0011	The 1997 Operating Agreement.	James Edwards
353	Detroit Institute of Art	Ownership/Restrictions	Ambac	DR0054	All documents that reflect the City's ownership interest in, and the restrictions on the transfer of, all artwork held at the Detroit Institute of Art, including without limitation the artwork not appraised by Christie's.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
354	Detroit Institute of Art	Provenance	EEPK FMS WT FGIC	DR0028	28. All Documents concerning information pertaining to the Collection, including, without limitation, artist, medium, accession date, credit and provenance.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
355	Detroit Institute of Art	Provenance	Syncora	DR0003	Provenance listings for every object and work of art in the Collection.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
356	Detroit Institute of Art	Restricted City Ownership	EEPK FMS WT FGIC	DR0030	30. All Documents and Communications concerning the City's ownership interest in, and any restrictions on the transfer of, the Collection or any part of the Collection, including, without limitation, the part of the Collection that has not been appraised by Christie's.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
357	Detroit Institute of Art	Restricted City Ownership	EEPK FMS WT FGIC	DR0031	31. All Documents and Communications concerning any restrictions placed by donor(s) on the Founder's Society, the DIA Corp., the City or the Museum with respect to the use, display, reproduction, sale, transfer, or disposition of the Major Works that became part of the Collection as the result of a donation, gift, or bequest.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
358	Detroit Institute of Art	Restricted City Ownership	EEPK FMS WT FGIC	DR0032	32. All Documents and Communications concerning restrictions placed by the Founder's Society or the DIA Corp. on the City or the Museum with respect to each of the Major Works transferred to the City or the Museum by either the Founder's Society or the Museum.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
359	Detroit Institute of Art	Restricted City Ownership	EEPK FMS WT FGIC	DR0056	56. All Documents and Communications concerning restrictions or limitations on the use, display, reproduction, sale, transfer, or disposition of each and every of object or work that is a part of the Collection as the result of a donation, gift, bequest, or otherwise, including, without limitation, restrictions or limitations on the use or disposition of each object or work that is part of the Collection imposed by the donor(s) or that otherwise exist.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
360	Detroit Institute of Art	Restricted City Ownership	Syncora	DR0004	All documents and communications relating to any restrictions on the objects and works of art in the Collection, including, but not limited to, restrictions on exhibition, storage, conservation, deaccession, sale, exchange, or loan.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
361	Detroit Institute of Art	Restricted City Ownership	Syncora	DR0013	All documents and communications relating to the procedures of the City, the Founders Society, or DIA Corp. for accepting or rejecting restricted donations, gifts, and bequests of works of art or funds.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
362	Detroit Institute of Art	Role of DIA in Midtown Detroit Revitalization	Syncora	DR0033	All documents and communications relating to DIA Corp.'s role in the revitalization of midtown Detroit.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
363	Detroit Institute of Art	Sale	Syncora	DR0009	All documents, communications, and notifications sent to any donor or settlor that relate to the deaccession, sale, auction, exchange, or disposal of any of the objects or works of art by DIA Corp., the Founders Society, or the City.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
364	Detroit Institute of Art	Sale	Syncora	DR0014	All documents and communications relating to the procedures for the deaccession, auction, exchange, sale, loan, or other disposition of any object or work of art held or owned by DIA Corp., the Founders Society, or the City that is subject to restrictions on deaccession, auction, exchange, sale, loan, or other form of alienation.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
365	Detroit Institute of Art	State Communications	EEPK FMS WT FGIC	DR0057	57. All Documents concerning Communications between the City and anyone in the Michigan Attorney General's office concerning the Collection, the DIA Settlement, the Foundation Commitments, or the State Contribution.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
366	Detroit Institute of Art	Surveys	Syncora	DR0018	All visitor surveys, participation surveys, audience surveys, population surveys, or visit surveys relating to DIA Corp.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
367	Detroit Institute of Art	Tax Documents	Syncora	DR0008	All documents and communications provided to the Internal Revenue Service that relate to the deaccession, auction, sale, exchange, loan, or other disposition of any object or work of art by DIA Corp., the Founders Society, or the City, including, but not limited to, any IRS Forms 8282.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
368	Detroit Institute of Art	Tax Returns	EEPK FMS WT FGIC	DR0050	50. Each and every City, federal and state tax return filed by DIA Corp. from 1997 to present.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
369	Detroit Institute of Art	Tax Returns	EEPK FMS WT FGIC	DR0052	52. All Documents concerning the Collection constituting part of each and every tax return filed by the City.	John Naglick Eric Higgs
370	Detroit Institute of Art	Unrestricted Endowments - Amounts	Retirement Systems	DR0007	7. Produce all documents evidencing the current dollar amount of any unrestricted endowments of the DIA.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
371	Detroit Institute of Art	Valuation	Ambac	DR0055	All documents and communications that relate to the potential monetization of the artwork held at the Detroit Institute of Art other than pursuant to the DIA Settlement, the potential or estimated revenue from such monetization, and the reasons why such monetization has not been pursued.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
372	Detroit Institute of Art	Valuation	EEPK FMS WT FGIC	DR0027	27. All Documents and Communications concerning those works of art in the Collection that may have been given an estimated value (or range of values) by the City or DIA Corp., for insurance purposes or otherwise, of \$1 million or more.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
373	Detroit Institute of Art	Valuation	EEPK FMS WT FGIC	DR0058	58. All Documents and Communications concerning any valuation of the Museum Assets listed on Exhibit A to Exhibit I.A.79 of the Plan.	Other than what is publicly available, after inquiry to John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, the City does not believe it has responsive, non-privileged documents.
374	Detroit Institute of Art	Valuation	Retiree Committee	DR0044	All documents explaining, discussing, describing, showing or analyzing: (a) the value of all or any works of art in the DIA Collection that are valued at or greater than \$500,000, (b) any restrictions on the sale of any work of art in the DIA Collection valued at or greater than \$500,000, and (c) the insured value of the DIA Collection or any work of art contained therein.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
375	Detroit Institute of Art	Valuation	Syncora	DR0022	Documents sufficient to identify any object or work of art in the Collection that has been appraised or valued for \$1 million or more.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
376	Detroit Institute of Art	Valuation	Syncora	DR0023	Any and all valuations or appraisals of any object or work of art in the Collection.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
377	Detroit Institute of Art	Valuations	Retirement Systems	DR0004vii-viii	4. With respect to the DIA, produce the following: vii. all documents relating to valuations, appraisals, or estimated fair market value for the "Museum Assets" as that term is defined in the DIA Settlement Term Sheet, including the art collection, operating assets, buildings, parking lots and structures, and the like; viii. all documents and communications between the DIA Corp., the Foundations, and/or the City expressing an opinion as to the City's ability to sell or otherwise monetize the art.	John Hill, James Edwards, James Naglick, Eric Higgs, David Whittaker, and Edward Keelean, but the City does not believe it has responsive, non-privileged documents.
378	Detroit Land Bank Authority or Michigan Land Bank	City Initiatives	Retiree Committee	DR0060	All documents explaining, discussing, describing, showing or analyzing any arrangements between the City or any other party and the Detroit Land Bank Authority and/or the Michigan Land Bank concerning the City's initiatives for addressing blight, removing vacant structures and encouraging the beneficial use of City-owned land, as outlined in sections VII.A.5 and IX.A.1 of the Amended Disclosure Statement.	Conway MacKenzie Sonya Mays Mayor Mike Duggan
379	Detroit Land Bank Authority or Michigan Land Bank	Plan Initiatives	Ambac	DR0097	All documents, including without limitation agreements and proposals, relating to any arrangements with the Detroit Land Bank Authority, the Michigan Land Bank. Include in your answer all documents and communications relating to the arrangements with respect to the "initiatives involving the Detroit Land Bank Authority and the Michigan Land Bank" referenced on page 26 of the Disclosure Statement.	Conway MacKenzie Sonya Mays Mayor Mike Duggan
380	Detroit Land Bank Authority or Michigan Land Bank	Plan Initiatives	Retirement Systems	DR0034	34. Produce all documents, including agreements or proposals, relating to any arrangements with the Detroit Land Bank Authority and the Michigan Land Bank relating to the "initiatives involving the Detroit Land Bank Authority and the Michigan Land Bank" referenced in the Disclosure Statement.	Conway MacKenzie Sonya Mays Mayor Mike Duggan
381	Detroit Water and Sewerage Department (DWSD)	Accounts Receivable	EEPK FMS WT FGIC	DR0086	86. All Documents and Communications concerning accounts receivable owed to the DWSD, including, without limitation, (a) the category, (b) nature, (c) the amount of such accounts receivable, and (d) the collectability of such accounts receivable.	Conway MacKenzie Sanjay Marken Department of Water Rick Drumb Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
382	Detroit Water and Sewerage Department (DWSD)	Accounts Receivable	EEPK FMS WT FGIC	DR0087	87. All Documents and Communications concerning any contracts between the DWSD and collection agencies concerning the collection of accounts receivable owed to DWSD.	Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
383	Detroit Water and Sewerage Department (DWSD)	Accounts Receivable	EEPK FMS WT FGIC	DR0088	88. All documents concerning the value or collectability of the accounts receivable owed to DWSD.	Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
384	Detroit Water and Sewerage Department (DWSD)	Bank Statements	DWSD Discovery Parties	DR0007	7. All bank statements for the Systems from January 1, 2009 to the present.	Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
385	Detroit Water and Sewerage Department (DWSD)	Bond Issuance	DWSD Discovery Parties	DR0013	13. All Documents relating to any anticipated bond issues or financing on behalf of the Systems, including financial analysis, cash flow projections, structuring detail, credit enhancement provided, financing team contact information, timeline of issuance and estimated interest rates.	William Wolfson Amanda VanDusen
386	Detroit Water and Sewerage Department (DWSD)	Bond Issuance	DWSD Discovery Parties	DR0028a-c	28. All Documents relating to the New DWSD Bonds, the New DWSD Revolving Bonds, the New Existing Rate DWSD Bonds, the New Existing Rate GLWA Bonds, the New GLWA Bonds, the New GLWA Revolving Bonds, and any other bond relating to the Systems proposed or otherwise referenced in the Plan, including all Documents relating to: a. The determination and calculation of interest rates set forth in the Interest Rate Reset Chart attached as Exhibit I.A.159 to the Disclosure Statement, including the basis for changes made to the rates referenced in the corresponding exhibit in earlier versions of the Disclosure Statement; b. The City's proposed modification or elimination of the "no-call" provisions in the DWSD Water and Sewer Bonds; c. The City's proposed amendment of the definition of "operations and maintenance expenses" to include, inter alia, the amount of any lease payment payable to the City's General Fund;	Sanjay Marken Supplemental Review/Production Currently Underway (Regarding GLWA)
387	Detroit Water and Sewerage Department (DWSD)	Bond Issuance	DWSD Discovery Parties	DR0028d-g	28. All Documents relating to the New DWSD Bonds, the New DWSD Revolving Bonds, the New Existing Rate DWSD Bonds, the New Existing Rate GLWA Bonds, the New GLWA Bonds, the New GLWA Revolving Bonds, and any other bond relating to the Systems proposed or otherwise referenced in the Plan, including all Documents relating to: d. Procuring or obtaining any public ratings for such bonds; e. Whether "holders of New Securities may encounter limited market acceptance of City credit upon any attempt to sell City debt obligations, making sales at or near par potentially difficult" as stated in the Disclosure Statement; f. The tax exempt status of interest payments on such bonds; and g. Procuring or obtaining municipal bond insurance for such bonds.	Supplemental Review/Production Currently Underway (Regarding GLWA)
388	Detroit Water and Sewerage Department (DWSD)	Bond Issuance	DWSD Discovery Parties	DR0029	29. All Documents relating to the impact of the New DWSD Bonds, the New Existing Rate DWSD Bonds, the New Existing Rate GLWA Bonds, the New GLWA Bonds, the New GLWA Revolving Bonds, and any other bond relating to the Systems proposed or otherwise referenced in the Plan on the value of the DWSD Bonds or the insurers of such bonds.	Supplemental Review/Production Currently Underway (Regarding GLWA)
389	Detroit Water and Sewerage Department (DWSD)	Bond Issuance	DWSD Discovery Parties	DR0055	55. All Documents relating to the New DWSD Issuance.	Sanjay Marken Jim Doak
390	Detroit Water and Sewerage Department (DWSD)	Bonds	Retiree Association	DR0048	48. All documents showing or reflecting whether (a) any of the DWSD Bonds or the DWSD Revolving Bonds (as defined in Section I.A.108 of the Amended Plan) have call protection provisions, (b) there is an original issue premium in connection with any of the DWSD Bonds or DWSD Revolving Bonds, (c) there is any right to payment in connection with any such call protection or original issue premium, (d) any requests or demands on the City to compensate holders of DWSD Bonds or DWSD Revolving Bonds on account of call protection or original issue premium, and (e) any analysis or position of the City with regard to call protection provisions or original issue premium.	Sanjay Marken Jim Doak
391	Detroit Water and Sewerage Department (DWSD)	Construction in Progress	DWSD Discovery Parties	DR0034	34. Documents sufficient to show construction projects that are in progress, including work to be performed and cost estimates for completing each project.	Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
392	Detroit Water and Sewerage Department (DWSD)	Consultant Reports	DWSD Discovery Parties	DR0053	53. All consultant reports for the Systems for the last 10 years.	Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
393	Detroit Water and Sewerage Department (DWSD)	Contracts Over \$5 million	DWSD Discovery Parties	DR0008	8. Documents sufficient to show contracts involving the Systems and any third party or vendor under which the City's total payments are equal to or exceed \$5 million.	Publicly Available (http://www.dwsd.org/pages_n/contracts.html)
394	Detroit Water and Sewerage Department (DWSD)	Conway MacKenzie Business Plan	EEPK FMS WT FGIC	DR0078	78. The Conway MacKenzie Business Plan, together with any exhibits or other documents attached thereto.	Conway MacKenzie Jim Doak
395	Detroit Water and Sewerage Department (DWSD)	Cost of Services Study	DWSD Discovery Parties	DR0042	42. The most recent cost of services study done for the City regarding the Systems.	Sanjay Marken, Conway MacKenzie, Department of Water, but the City is not aware of any responsive, non-privileged documents. Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
396	Detroit Water and Sewerage Department (DWSD)	Cost of Services Study	U.S. Bank	DR0010	The most recent cost of services study done for the City regarding each of the Systems.	Sanjay Marken, Conway MacKenzie, Department of Water, but the City is not aware of any responsive, non-privileged documents. Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
397	Detroit Water and Sewerage Department (DWSD)	Credit Analysis	DWSD Discovery Parties	DR0022	22. All Documents relating to any credit analysis relating to the Systems following the City's emergence from chapter 9, including any analysis performed by the City, the City's financial advisors, the City's investment bankers, any rating agency or any other third party.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
398	Detroit Water and Sewerage Department (DWSD)	Customer Discontinuation	DWSD Discovery Parties	DR0043	43. Documents that refer to the prospect of any wholesale or retail customers or groups of customers discontinuing use of the Systems so as to lead to a material decrease in the Systems' gross revenue.	Conway MacKenzie Sanjay Marken Department of Water
399	Detroit Water and Sewerage Department (DWSD)	Customer Discontinuation	Macomb County	DR0047	REQUEST NO. 47: All documents that refer to the prospect of any wholesale customers or groups of customers discontinuing use of the Systems after January 1, 2014.	Conway MacKenzie Sanjay Marken Department of Water
400	Detroit Water and Sewerage Department (DWSD)	Customer Discontinuation	Oakland	DR0007	7. Documents that refer to the prospect of any wholesale or retail customers or groups of customers discontinuing use of the Systems and leading to a Material decrease in gross revenue.	Conway MacKenzie Sanjay Marken Department of Water
401	Detroit Water and Sewerage Department (DWSD)	Customer Discontinuation	U.S. Bank	DR0014	Documents that refer to the prospect of any wholesale or retail customers or groups of customers discontinuing use of the Systems and leading to a Material decrease in gross revenue.	Conway MacKenzie Sanjay Marken Department of Water
402	Detroit Water and Sewerage Department (DWSD)	Environmental	DWSD Discovery Parties	DR0025	25. Documents sufficient to show formal or informal complaints or inquiries by governmental agencies, including environmental protection agencies, regarding environmental concerns from January 1, 2009 to the present and the estimated or actual costs of addressing any such	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
403	Detroit Water and Sewerage Department (DWSD)	Environmental	DWSD Discovery Parties	DR0026	26. Documents sufficient to show any hardship exemptions for the Systems provided by any environmental protection agency, and for each such exemption, all Documents relating to: (i) financial capability analysis to the exemption; (ii) the material operating expenses and capital expenditures to be incurred with the exemptions; and (iii) the material operating expenses and capital expenditures to be incurred with the exemptions.	Conway MacKenzie Sanjay Marken Department of Water

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
404	Detroit Water and Sewerage Department (DWSD)	Environmental	Macomb County	DR0031	REQUEST NO. 31: All documents supporting financial capability analysis to establish DWSD hardship exemptions provided to or received from the Environmental Protection Agency and/or the Michigan Department of Environmental Quality.	Conway MacKenzie Sanjay Marken Department of Water
405	Detroit Water and Sewerage Department (DWSD)	Environmental	Oakland	DR0022	22. Documents describing or evincing any DWSD hardship exemptions with the Environmental Protection Agency and/ or the Michigan Department of Environmental Quality.	Conway MacKenzie Sanjay Marken Department of Water
406	Detroit Water and Sewerage Department (DWSD)	Environmental	Oakland	DR0023	23. Documents supporting financial capability analysis to establish DWSD hardship exemptions provided to or received from the Environmental Protection Agency and/ or the Michigan Department of Environmental Quality.	Conway MacKenzie Sanjay Marken Department of Water
407	Detroit Water and Sewerage Department (DWSD)	Environmental	Oakland	DR0024	24. Documents reflecting the Material operating expenses and Capital Expenditures to be incurred both with and without DWSD hardship exemptions with the Environmental Protection Agency and/ or the Michigan Department of Environmental Quality.	Conway MacKenzie Sanjay Marken Department of Water
408	Detroit Water and Sewerage Department (DWSD)	Environmental	U.S. Bank	DR0029	Documents describing or evincing any DWSD hardship exemptions with the Environmental Protection Agency and/or the Michigan Department of Environmental Quality.	Conway MacKenzie Sanjay Marken Department of Water
409	Detroit Water and Sewerage Department (DWSD)	Environmental	U.S. Bank	DR0030	Documents supporting financial capability analysis to establish DWSD hardship exemptions provided to or received from the Environmental Protection Agency and/or the Michigan Department of Environmental Quality.	Conway MacKenzie Sanjay Marken Department of Water
410	Detroit Water and Sewerage Department (DWSD)	Environmental	U.S. Bank	DR0031	Documents reflecting the Material operating expenses and Capital Expenditures to be incurred both with and without DWSD hardship exemptions with the Environmental Protection Agency and/or the Michigan Department of Environmental Quality.	Conway MacKenzie Sanjay Marken Department of Water
411	Detroit Water and Sewerage Department (DWSD)	Facilities	DWSD Discovery Parties	DR0031	31. Documents sufficient to show the Systems' property, plants and equipment (including an inventory of spare parts and supplies), as well as other assets, and any valuation assessment or appraisal for such assets from January 1, 2009 to the present.	Conway MacKenzie Sanjay Marken Department of Water
412	Detroit Water and Sewerage Department (DWSD)	Facilities	DWSD Discovery Parties	DR0049	49. All Documents reflecting any valuation, assessment or estimate of, or opinion concerning, the capacity or condition of any treatment plant, pump station, pipeline, or any other Systems asset.	Conway MacKenzie Sanjay Marken Department of Water
413	Detroit Water and Sewerage Department (DWSD)	Facilities	Oakland	DR0010	10. Documents evincing any valuation, assessment, opinion or estimate of the capacity or condition of either System, the Systems together, and/ or facilities of each System, including, but not limited to, individual treatment plants, pumping stations, storage tanks, sewer overflow retention basis, and buried infrastructure.	Conway MacKenzie Sanjay Marken Department of Water

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
414	Detroit Water and Sewerage Department (DWSD)	Facilities	Oakland	DR0012	12. Documents cataloging System Assets, and any valuation, assessment, estimate or appraisals for either System, the Systems together, and/ or facilities of each System, including, but not limited to, individual treatment plants, pumping stations, storage tanks, sewer overflow retention basis, and buried infrastructure.	Conway MacKenzie Sanjay Marken Department of Water
415	Detroit Water and Sewerage Department (DWSD)	Facilities	U.S. Bank	DR0017	Documents evincing any valuation, assessment, opinion or estimate of the capacity or condition of either System, the Systems together, and/or facilities of each System, including, but not limited to, individual treatment plants, pumping stations, storage tanks, sewer overflow retention basis, and buried infrastructure.	Conway MacKenzie Sanjay Marken Department of Water
416	Detroit Water and Sewerage Department (DWSD)	Facilities	U.S. Bank	DR0019	Documents cataloging System Assets, and any valuation, assessment, estimate or appraisals for either System, the Systems together, and/or facilities of each System, including, but not limited to, individual treatment plants, pumping stations, storage tanks, sewer overflow retention basis, and buried infrastructure.	Conway MacKenzie Sanjay Marken Department of Water
417	Detroit Water and Sewerage Department (DWSD)	Feasibility Report - Foster Group	EEPK FMS WT FGIC	DR0077	77. The feasibility report, together with any exhibits and other documents attached thereto, prepared by the Foster Group relating to the DWSD.	Jim Doak Conway MacKenzie Department of Water
418	Detroit Water and Sewerage Department (DWSD)	Financial	DWSD Discovery Parties	DR0003	3. All audited financial statements including audit opinions and management letters for the Systems for fiscal years 2009 through 2013 and year-to-date for Fiscal Year 2014, including all Documents relating to any disputes with, or material issues raised by, such Systems' accountants or auditors with respect to operations of such Systems, including any significant issues regarding internal controls.	Publicly Available Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
419	Detroit Water and Sewerage Department (DWSD)	Financial	DWSD Discovery Parties	DR0004	4. All financial statements and supporting schedules for the Systems for fiscal years 2009 through 2013 and year-to-date for Fiscal Year 2014, including: a. Financial statements with restricted assets and equity components broken out; b. Income statements, including comparisons to budget; c. Historical statements of cash flows; d. Notes to financial statements; e. Balance sheets (actual); f. Detailed trial balances; g. Aged accounts receivable; h. Aged accounts payable; and i. Allowances for doubtful accounts and write-offs of bad debts.	Publicly Available Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
420	Detroit Water and Sewerage Department (DWSD)	Financial	Macomb County	DR0004i-vii	REQUEST NO. 4: All documents relating to DWSD's historical financial results for Fiscal Years 2009-2013 and year-to-date 2014, including but not limited to: i. DWSD's audited financial statements; ii. pro forma and actual balance sheets; iii. historical statements of cash flows; iv. notes to the historical financial statements; v. auditor's reports on the historical financial statements; vi. documents showing historical volumetric use, revenue and rate tariff by customer rate class and service/geographic area; vii. all disbursements made from the gross revenues of each System for administration, operation, maintenance, and capital expenditures; vi. any disbursements from the gross revenues of each System which will not be used for the operation, maintenance, or capital expenditures of such System;	Publicly Available Conway MacKenzie Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
421	Detroit Water and Sewerage Department (DWSD)	Financial	Macomb County	DR0004vii i-x	All documents relating to DWSD's historical financial results for Fiscal Years 2009-2013 and year-to-date 2014, including but not limited to: viii. any disbursements from the gross revenues of each System which were not used for the administration, operation, maintenance, or capital expenditures of such System; ix. to the extent not provided in response to the requests above, documents showing Fiscal Years 2013 and year-to-date 2014 financial results related to pension expense; operating expenses by category (i.e. power, chemicals, etc.); disbursements from DWSD to other City Departments, to the City's General Fund, or any retirement plan for City employees; costs for employee healthcare, insurance and other benefits; costs for pension and other postemployment benefits; employee headcount; bad debt expense by customer rate class and/or wholesale customer; and x. documents relating to cash flows to and from DWSD and any other City Department or the City's General Fund.	Publicly Available Conway MacKenzie Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
422	Detroit Water and Sewerage Department (DWSD)	Financial	Macomb County	DR0021	REQUEST NO. 21: All documents that reflect GRS pension charges to DWSD in DWSD's unaudited financial statements, including but not limited to documents that reflect any adjustment to GRS pension charges to DWSD.	These documents would most likely be in the custody and control of the Retirement Systems; the City is not aware of any responsive, non-privileged documents.
423	Detroit Water and Sewerage Department (DWSD)	Financial	Macomb County	DR0029	REQUEST NO. 29: All documents evidencing amounts held in the Operation and Maintenance Funds and the Constructions Funds for the System as of December 31, 2013.	Department of Water
424	Detroit Water and Sewerage Department (DWSD)	Financial	Macomb County	DR0030	REQUEST NO. 30: All documents evidencing any accounts of the Systems not controlled by the Trustee and the balances in such accounts, reflecting the cash in and out of the accounts from Fiscal Year 2013 and year-to-date Fiscal Year 2014.	Department of Water
425	Detroit Water and Sewerage Department (DWSD)	Financial	Oakland	DR0001a-i	1. Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: a) Historical statements of cash flows; b) Balance sheets (actual); c) Notes to the historical financial statements; d) Auditors' reports on the historical financial statements; e) Documents showing historical volumetric use, revenue and rate tariff by customer rate class and service/ geographic area; f) All disbursements made from the gross revenues of each System for administration, operation, maintenance, and Capital Expenditures; g) Any disbursements from the gross revenues of each System which were not used for the administration, operation, maintenance, or Capital Expenditures of such System; h) To the extent not provided in response to the requests above, Documents showing historical financial results related to pension expense; labor expense by category; operating expenses by category (i.e. power, chemicals, etc.); disbursements from DWSD to other City departments, to the City's General Fund, or to any retirement plan for City employees; costs for employee healthcare, insurance and other benefits; costs for pension and other postemployment benefits; employee headcount; bad debt expense by customer rate class and/ or wholesale customer; days sales outstanding; accounts receivable aging; and refinancing and future financing; and i) Documents relating to cash flows to and from DWSD and any other City department or the City's General Fund.	Publicly Available Conway MacKenzie Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
426	Detroit Water and Sewerage Department (DWSD)	Financial	Oakland	DR0018	18. Documents evincing amounts held in the Operation and Maintenance Funds and the Construction Funds for the Systems.	Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
427	Detroit Water and Sewerage Department (DWSD)	Financial	Oakland	DR0019	19. Documents evincing any accounts of the Systems not controlled by the Trustee and the balances in such accounts, reflecting the cash in and out of the accounts, from Fiscal Year 2013 and year-to-date for Fiscal Year 2014.	Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
428	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-A	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: a) Historical statements of cash flows;	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
429	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-B	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: b) Balance sheets (actual);	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
430	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-C	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: c) Notes to the historical financial statements;	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
431	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-D	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: d) Auditors' reports on the historical financial statements;	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
432	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-E	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: e) Documents showing historical volumetric use, revenue and rate tariff by customer rate class and service/geographic area;	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
433	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-F	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: f) All disbursements made from the gross revenues of each System for administration, operation, maintenance, and Capital Expenditures;	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
434	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-G	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: g) Any disbursements from the gross revenues of each System which were not used for the administration, operation, maintenance, or Capital Expenditures of such System;	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
435	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-H	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: h) To the extent not provided in response to the requests above, Documents showing historical financial results related to pension expense; labor expense by category; operating expenses by category (i.e. power, chemicals, etc.); disbursements from DWSD to other City Departments, to the City's General Fund, or to any retirement plan for City employees; costs for employee healthcare, insurance and other benefits; costs for pension and other postemployment benefits; employee headcount; bad debt expense by customer rate class and/or wholesale customer; days sales outstanding; accounts receivable aging; and refinancing and future financing.	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
436	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0008-I	Documents showing DWSD's financial results for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014, including, but not limited to: i) Documents relating to cash flows to and from DWSD and any other City Department or the City's General Fund.	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
437	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0025	Documents evincing amounts held in the Operation and Maintenance Funds and the Construction Funds for the Systems.	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
438	Detroit Water and Sewerage Department (DWSD)	Financial	U.S. Bank	DR0026	Documents evincing any accounts of the Systems not controlled by the Trustee and the balances in such accounts, reflecting the cash in and out of the accounts, from Fiscal Year 2013 and year-to-date for Fiscal Year 2014.	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
439	Detroit Water and Sewerage Department (DWSD)	Financial - Expenses	DWSD Discovery Parties	DR0033	33. Documents sufficient to show, by project or program, administrative, operational or any other expenses for maintenance programs, deferred maintenance programs, emergency maintenance projects, and capital expenditure programs, for the Systems from January 1, 2009 to the present.	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
440	Detroit Water and Sewerage Department (DWSD)	Financial - Accounts Not Controlled by Trustee	DWSD Discovery Parties	DR0046	46. Documents sufficient to show any accounts of the Systems not controlled by the Water and Sewer Bond Trustee and the balances in such accounts, reflecting the cash in and out of the accounts, from the Petition Date to present.	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
441	Detroit Water and Sewerage Department (DWSD)	Financial - Accounts Receivable	DWSD Discovery Parties	DR0037	37. Documents sufficient to show historical and current days sales outstanding, including accounts receivable historical aging schedules for the Systems.	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
442	Detroit Water and Sewerage Department (DWSD)	Financial - Amounts in Various Funds	DWSD Discovery Parties	DR0045	45. Documents sufficient to show amounts held in the Operation and Maintenance Fund and the Construction Fund for the Systems.	Sanjay Marken Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
443	Detroit Water and Sewerage Department (DWSD)	Financial - Bad Debt Expense	DWSD Discovery Parties	DR0038	38. Documents sufficient to show historical and current bad debt expense as a percent of gross accounts receivable for the Systems.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
444	Detroit Water and Sewerage Department (DWSD)	Financial - Bond Ratings	Macomb County	DR0050	REQUEST NO. 50: All documents relating to the effect of each of the DWSD Options on water and sewer bond ratings, including but not limited to documents sufficient to demonstrate whether the impairment of existing Sewer Bonds will increase the cost of debt in the future and if and how any increased cost will be passed on to ratepayers.	Conway MacKenzie Sanjay Marken Ken Buckfire Supplemental Review/Production Currently Underway (Regarding GLWA)
445	Detroit Water and Sewerage Department (DWSD)	Financial - Capital Expenditures	DWSD Discovery Parties	DR0035	35. All Documents relating to any analyses or assessments of necessary or appropriate capital expenditures or improvements for the Systems made by the City, the DWSD, any county (including Macomb, Oakland, Wayne, St. Clair, Genesee, Washtenaw, or Monroe Counties), any wholesale customers or any consultant or representative acting on behalf of any aforementioned entity or customer.	Sanjay Marken Conway MacKenzie Department of Water
446	Detroit Water and Sewerage Department (DWSD)	Financial Consultants	DWSD Discovery Parties	DR0009	9. Documents sufficient to show professional, consulting, advisory or other related fees and expenses, broken out by provider and amount, that have been or are expected to be charged to the Systems in connection with the City's chapter 9 bankruptcy proceeding.	Sanjay Marken, Conway MacKenzie, Department of Water, but to the best of the City's knowledge, there are no responsive, non-privileged documents.
447	Detroit Water and Sewerage Department (DWSD)	Financial/Consultants	Macomb County	DR0060	REQUEST NO. 60: A listing of the professional, consulting, advisory or other related fees and expenses of the professionals engaged by the City to be charged to either System in connection with the City's chapter 9 bankruptcy or in connection with any of the DWSD Options.	Sanjay Marken, Conway MacKenzie, Department of Water, but to the best of the City's knowledge, there are no responsive, non-privileged documents.
448	Detroit Water and Sewerage Department (DWSD)	Financial/Consultants	Oakland	DR0035	35. A listing of the professional, consulting, advisory or other related fees and expenses of professionals engaged by the City to be charged to either System in connection with the City's chapter 9 bankruptcy or any transfer of either System contemplated in the Plan.	Sanjay Marken, Conway MacKenzie, Department of Water, but to the best of the City's knowledge, there are no responsive, non-privileged documents.
449	Detroit Water and Sewerage Department (DWSD)	Financial/Consultants	U.S. Bank	DR0042	A listing of the professional, consulting, advisory or other related fees and expenses of professionals engaged by the City to be charged to either System in connection with the City's chapter 9 bankruptcy or any transfer of either System contemplated in the Plan.	Sanjay Marken, Conway MacKenzie, Department of Water, but to the best of the City's knowledge, there are no responsive, non-privileged documents.
450	Detroit Water and Sewerage Department (DWSD)	Financial/Projects	Macomb County	DR0032	REQUEST NO. 32: All documents relating to capital improvements that are currently needed or may in the future be needed by DWSD, including but not limited to documents reflecting the cost of needed capital improvements.	Sanjay Marken Conway MacKenzie Department of Water
451	Detroit Water and Sewerage Department (DWSD)	Historical Credit Ratings for DWSD Bonds	DWSD Discovery Parties	DR0023	23. Documents sufficient to show the City's credit rating(s) for the DWSD Bonds from January 1, 2005 to the present.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
452	Detroit Water and Sewerage Department (DWSD)	Impact of Professional Fee Reserve	DWSD Discovery Parties	DR0069	69. All Documents relating to the Professional Fee Reserve, including the source and amount of funding, and the impact of any DWSD Transaction on the Professional Fee Reserve.	Sanjay Marken Jim Doak
453	Detroit Water and Sewerage Department (DWSD)	Indicative Interest Rates for DWSD Bonds	Retiree Association	DR0046	46. All documents relating to the "Indicative Interest Rates" for DWSD Bonds (as defined in Section I.A.95 of the Amended Plan) as set forth in Exhibit I.A.150 of the Plan, including but not limited to documents relating to the calculation of such rates and the assumptions underlying such calculation.	Sanjay Marken Jim Doak

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
454	Detroit Water and Sewerage Department (DWSD)	Insurance	DWSD Discovery Parties	DR0032	32. Any insurance policies for the benefit of the Systems.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
455	Detroit Water and Sewerage Department (DWSD)	Interest Rate Reset	Macomb County	DR0051	REQUEST NO. 51: All reports, whether generated internally or by outside consultants, regarding the appropriate interest rate and comparables utilized in creating the Interest Rate Reset Chart, attached as Exhibit I.A.159 to the City's proposed plan. The following exhibits (or current versions thereof) to the Plan: i. Form of New DWSD Bond Documents; ii. Form of New Existing Rate DWSD Bond Documents; iii. Form of New Existing Rate GLWA Bond Documents; iv. Form of New GLWA Bond Documents; and v. Form of New GLWA Revolving Bond Documents.	Sanjay Marken; Publicly Available
456	Detroit Water and Sewerage Department (DWSD)	Investigations of Bond Issuance	DWSD Discovery Parties	DR0027	27. All Documents relating to any inquiry, formal or informal, by the Internal Revenue Service, the Environmental Protection Agency, the Michigan Department of Environmental Quality, the Securities and Exchange Commission, the Department of Justice or the Federal Bureau of Investigation or any other governmental authority, federal or state, with respect to any bonds, notes or other securities issued by or on behalf of the City with respect to the Systems, including the estimated costs to remediate any identified issues.	Department of Water
457	Detroit Water and Sewerage Department (DWSD)	Labor	Macomb County	DR0018	REQUEST NO. 18: All documents reflecting any severance pay policies for DWSD employees.	Conway MacKenzie Sanjay Marken Department of Water
458	Detroit Water and Sewerage Department (DWSD)	Labor	Oakland	DR0011	11. Any and all opinions, assessments, studies or reports reflecting current and projected optimal employee headcounts for DWSD.	Conway MacKenzie Sanjay Marken Department of Water
459	Detroit Water and Sewerage Department (DWSD)	Labor	Oakland	DR0025	25. Documents evincing or referring to "feather-bedding" within DWSD, and any and all opinions, assessments, studies or reports reflecting any proposed solutions to such issues.	Conway MacKenzie Sanjay Marken Department of Water
460	Detroit Water and Sewerage Department (DWSD)	Labor	Oakland	DR0027	27. Documents reflecting any severance pay policies for DWSD employees.	Conway MacKenzie Sanjay Marken Department of Water
461	Detroit Water and Sewerage Department (DWSD)	Labor	U.S. Bank	DR0034	Documents reflecting any severance pay policies for DWSD employees.	Conway MacKenzie Sanjay Marken Department of Water
462	Detroit Water and Sewerage Department (DWSD)	Labor - Employee Headcount	DWSD Discovery Parties	DR0047	47. All Documents reflecting opinions, assessments, studies or reports reflecting current and projected optimal employee headcounts for the Systems.	Conway MacKenzie Sanjay Marken Department of Water
463	Detroit Water and Sewerage Department (DWSD)	Labor - Employee Headcount	DWSD Discovery Parties	DR0048	48. Documents sufficient to show the schedules of full-time employees of the Systems by specific titles and roles, age, years of service, salaries, and expected year of retirement for Fiscal Years 2009 through 2013 and year-to-date for Fiscal Year 2014.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
464	Detroit Water and Sewerage Department (DWSD)	Labor - Employee Headcount	U.S. Bank	DR0018	Any and all opinions, assessments, studies or reports reflecting current and projected optimal employee headcounts for DWSD.	Conway MacKenzie Sanjay Marken Department of Water

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
465	Detroit Water and Sewerage Department (DWSD)	Labor - Feather Bedding	DWSD Discovery Parties	DR0052	52. All Documents evincing or referring to the practice of providing advantageous working conditions or requiring unnecessary work (sometimes referred to "feather-bedding") within the DWSD, or labor optimization for the DWSD, and any and all opinions, assessments, studies or reports analyzing such issues or reflecting any proposed solutions to such issues.	Conway MacKenzie Sanjay Marken Department of Water
466	Detroit Water and Sewerage Department (DWSD)	Labor - Feather Bedding	U.S. Bank	DR0032	Documents evincing or referring to "feather-bedding" within DWSD, and any and all opinions, assessments, studies or reports reflecting any proposed solutions to such issues.	Conway MacKenzie Sanjay Marken Department of Water
467	Detroit Water and Sewerage Department (DWSD)	Labor - Labor Relations Assessment	DWSD Discovery Parties	DR0051	51. All Documents relating to any labor relations assessment concerning the DWSD.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
468	Detroit Water and Sewerage Department (DWSD)	Labor - Terms in Event of DWSD Transaction (Including Severance Policy)	DWSD Discovery Parties	DR0050	50. All Documents relating to employment terms for employees of the Systems in the event of any DWSD Transaction referenced in the Disclosure Statement, including severance policies and Communications with union or other labor representatives for employees of the Systems.	Conway MacKenzie Sanjay Marken Department of Water
469	Detroit Water and Sewerage Department (DWSD)	Legislation	DWSD Discovery Parties	DR0021	21. All Documents relating to any pending, proposed or contemplated legislation or regulations relating to the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
470	Detroit Water and Sewerage Department (DWSD)	Minutes	DWSD Discovery Parties	DR0030	30. The Minutes of all meetings of the Systems' governing body from January 1, 2009 to the present.	Publicly Available (http://www.dwsd.org/pages_n/bowc_calendar_2013.html) Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
471	Detroit Water and Sewerage Department (DWSD)	Monatization	EEPK FMS WT FGIC	DR0074	74. All Documents and Communications concerning the DWSD Transaction, the GWLA, or any potential privatization of all or part of the DWSD.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson. Supplemental Review/Production Currently Underway (Regarding GLWA)
472	Detroit Water and Sewerage Department (DWSD)	Monatization	EEPK FMS WT FGIC	DR0075	75. All Documents evidencing Communications concerning the DWSD Transaction, the GWLA, or any potential privatization of all or part of the DWSD including, without limitation, communications between the City and (i) any representative of Wayne, Oakland, or Macomb counties, or (ii) any person solicited to provide proposals and/or bids to the City.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)
473	Detroit Water and Sewerage Department (DWSD)	Monatization	EEPK FMS WT FGIC	DR0076	76. All Documents and Communications concerning all proposals and analyses related to restructuring DWSD, including, without limitation, costs of such restructuring and the actual or projected resulting savings or value to be realized by the City from such restructuring.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)
474	Detroit Water and Sewerage Department (DWSD)	Monetization	Ambac	DR0052	All documents and communications pertaining to proposals and analyses related to the restructuring the Detroit Water and Sewerage Department, whether implemented, considered, or proposed, including costs of such restructuring and the actual or projected resulting savings.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
475	Detroit Water and Sewerage Department (DWSD)	Monetization	DWSD Discovery Parties	DR0014a-e	All Documents relating to the GLWA, or any DWSD Transaction referenced in the Disclosure Statement, or to any previously proposed DWSD Transaction referenced in earlier version(s) of the Disclosure Statement, including all Documents related to: a. Communications with Macomb, Oakland, Wayne, St. Clair, Genesee, Washtenaw, or Monroe Counties, the State of Michigan, or any other County or entity (public or private), including Documents reflecting any meetings or negotiations with the above entities, or that were provided to or received from such entities; b. A potential public-private partnership as an alternative to any DWSD Transaction, including all Communications regarding the DWSD RFI; c. Any pro forma financial statements of GLWA; d. Any analysis of the economic gains/losses expected to be achieved/incurred, including any pro forma projection of any changes to bond debt service relating to the Systems; e. All rate studies, including rate study comparisons with other systems;	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)
476	Detroit Water and Sewerage Department (DWSD)	Monetization	DWSD Discovery Parties	DR0014f-j	All Documents relating to the GLWA, or any DWSD Transaction referenced in the Disclosure Statement, or to any previously proposed DWSD Transaction referenced in earlier version(s) of the Disclosure Statement, including all Documents related to: f. Sizing of and analytical support for any lease payments or proposed lease payments to be made by GLWA, including the determination and calculation of such lease payments; g. Communications regarding any lease payments or proposed lease payments to be made by GLWA; h. The stretch-out reduction in the DWSD's labor force from approximately 1,700 to 1,000 through 2012, including the potential impact on wholesale contract renewals; i. Any feasibility assessments of GLWA; j. The benefits or burdens of entering any DWSD Transaction, including any studies, analyses or reports;	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)
477	Detroit Water and Sewerage Department (DWSD)	Monetization	DWSD Discovery Parties	DR0014k-p	All Documents relating to the GLWA, or any DWSD Transaction referenced in the Disclosure Statement, or to any previously proposed DWSD Transaction referenced in earlier version(s) of the Disclosure Statement, including all Documents related to: k. The consideration of or decision about whether to enter any DWSD Transaction; l. The consideration of or decision about how to structure the GLWA or any DWSD Transaction; m. Any Payment in Lieu of Taxes (PILOT) programs; n. Any requests for proposal regarding financing for the Systems; o. The fees, expenses and costs of all professionals incurred or that will be incurred in connection with any DWSD Transaction; and p. Any analysis of projected or anticipated cost savings.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)
478	Detroit Water and Sewerage Department (DWSD)	Monetization	DWSD Discovery Parties	DR0015	All Documents relating to the impact of any DWSD Transaction on the value of the DWSD Bonds or the insurers of such bonds.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
479	Detroit Water and Sewerage Department (DWSD)	Monetization	DWSD Discovery Parties	DR0018	All Documents relating to the City's consideration of a private party purchase, public-private partnership, lease or operation and management of the Systems, including information provided to potential purchasers or investors.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
480	Detroit Water and Sewerage Department (DWSD)	Monetization	DWSD Discovery Parties	DR0020	20. All Documents relating to proposals, analyses, studies or reports related to the restructuring of the Systems, whether implemented, considered or proposed, including the costs of such restructuring and any actual or projected savings.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
481	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0011	All documents relating to any meetings concerning the DWSD Options, including but not limited to meetings between or among any or all of the Debtor and its agents or advisors on the one hand, and the Emergency Manager, and its agents or advisors on the other hand.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
482	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0012	All documents relating to the RFIs, including but not limited to: i. any responses received from potential private operators of DWSD; ii. any documents relating to any meetings, negotiations, discussions or communications concerning the RFI and responses thereto; iii. any documents sent to, received by, or made available for inspection by potential private operators of DWSD participating in the RFI; and iv. any confidential memoranda provided to the potential private operators of DWSD.	Pursuant to the Court's May 12, 2014 ruling, these documents are commercially sensitive and need not be produced at this time.
483	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0017	All documents evidencing all communications between or among the City, DWSD, the Emergency Manager, union or other labor representatives for employees of DWSD, and their respective financial advisors and agents and any other parties regarding the DWSD Options or potential "monetization" of the Systems.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
484	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0033	REQUEST NO. 33: All documents relating to any financial analyses conducted in connection with the creation and performance of a Regional Authority, including but not limited to any documents reflecting financial projections for the Regional Authority.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
485	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0034	All documents relating to or supporting the Debtor's contention that the base lease payment from the Regional Authority to the Debtor should be set at \$47 million per year, including but not limited to any financial due diligence or analyses conducted in connection with the \$47 million per year number.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
486	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0035	All documents that reflect the proposed governance structure of the Regional Authority.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
487	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0036	All documents that reflect whether DWSD or the Regional Authority, under each of the DWSD Options, will be a "stand-alone" enterprise, such that all administrative functions such as human resources, information technologies, and legal services, will be performed exclusively within the entity performing DWSD's functions.	Sanjay Marken Conway MacKenzie Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
488	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0055	REQUEST NO. 55: All documents relating to any analysis in connection with how each of the DWSD Options would meet the feasibility requirement of section 943(b)(7) of the Bankruptcy Code.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)
489	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0056	REQUEST NO. 56: All documents relating to any potential sale or lease of assets of the System between a private party and the Debtor under the DWSD Options, including but not limited to: i. documents relating to any belief that the cost of the lease or sale payments will be considered a tax if such cost is subsequently passed on to ratepayers; ii. documents providing the bases for such belief; and iii. documents reflecting any analyses of whether such tax is lawful.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)
490	Detroit Water and Sewerage Department (DWSD)	Monetization	Macomb County	DR0059	REQUEST NO. 59: All documents referring to any alternatives the Counties have to the water and/or sewer services currently provided by DWSD.	Kevin Haggard Sanjay Marken Mike Hausman Wade Johnston Department of Water
491	Detroit Water and Sewerage Department (DWSD)	Monetization	Oakland	DR0026	26. Documents evincing all communications between or among the City, DWSD, union or other labor representatives for employees of DWSD, and any other parties regarding a potential disposition or "monetization" of the Systems.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Department of Water Supplemental Review/Production Currently Underway (Regarding GLWA)
492	Detroit Water and Sewerage Department (DWSD)	Monetization	Oakland	DR0029	29. Documents relating to the prospect of forming or plan to form any regional authority or private enterprise to operate, manage, and/ or own the Systems.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Department of Water Supplemental Review/Production Currently Underway (Regarding GLWA)
493	Detroit Water and Sewerage Department (DWSD)	Monetization	Oakland	DR0031	31. Documents evincing negotiations, agreements or understandings with any municipal counterparties, including, without limitation, Clinton County, Macomb County, Oakland County, Wayne County, and any other County or entity (public or private) regarding disposition or "monetization" of the Systems or altering rates chargeable by the Systems.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Department of Water Supplemental Review/Production Currently Underway (Regarding GLWA)
494	Detroit Water and Sewerage Department (DWSD)	Monetization	Oakland	DR0032	32. Documents containing any opinion, assessment, report or analysis of the City's or DWSD's ability to reject or unilaterally modify, on a nonconsensual basis, any of the agreements with the municipal counterparties.	Sanjay Marken, Conway MacKenzie, and Department of Water, but the City is not aware of any responsive, non-privileged documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
495	Detroit Water and Sewerage Department (DWSD)	Monetization	Oakland	DR0050	50. Documents, evincing negotiations, agreements or understandings with any municipal counterparties, including, without limitation, Genesee County, and any other County or entity (public or private) regarding disposition or "monetization" of the Systems or altering rates chargeable by the Systems.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
496	Detroit Water and Sewerage Department (DWSD)	Monetization	Retiree Association	DR0043	43. All documents explaining, discussing or describing any actual or potential transaction involving a sale or lease of substantially all assets operated by DWSD to another entity, including but not limited to (a) data, notes, or analyses by hired consultants related to investigation of a privatization or other sale of DWSD assets to a private operator, and (b) any term sheets, memorandums of understanding or similar documents, whether in draft or final form, between the City and any prospective operator.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
497	Detroit Water and Sewerage Department (DWSD)	Monetization	Retiree Association	DR0045	45. All correspondence with private operators regarding the negotiation of a transaction described in Request No. 43, including but not limited to correspondence showing or reflecting the value or amount of assumed liabilities, deferred capital expenditures, rates charged to DWSD customers, operating maintenance budget or value of DWSD assets (whether individually or in the aggregate).	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
498	Detroit Water and Sewerage Department (DWSD)	Monetization	Retiree Association	DR0047	47. All correspondence and documents, including drafts, minutes, notes, relating to the City's understanding (or lack thereof) of how a DWSD Transaction would enable the City to make "larger, more rapid or more certain distributions to at least some of its creditors" as referenced in Section VIII.K of the Amended Disclosure Statement.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie
499	Detroit Water and Sewerage Department (DWSD)	Monetization	Retiree Committee	DR0025	All documents explaining, discussing or describing: (a) the "DWSD Transaction" (as defined in Section I.A.118 of the Amended Plan), (b) any actual or potential transaction involving formation of an "authority" as described in M.C.L. § 124.282, (c) the deferred capital expenditures of DWSD, including all such expenditures encompassed in the discussion in Section VII.D.6 of the Amended Disclosure Statement, and (d) projected or contemplated rates, rate structure, and/or rate increases, for DWSD after the Effective Date of the Amended Plan.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
500	Detroit Water and Sewerage Department (DWSD)	Monetization	Retiree Committee	DR0027	All correspondence with counties, other municipalities or private operators showing or reflecting the value or amount of assumed liabilities, DWSD assets, deferred capital expenditures, rates charged to DWSD customers, operating maintenance budget (whether individually or in the aggregate) in the DWSD Transaction.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
501	Detroit Water and Sewerage Department (DWSD)	Monetization	Retirement Systems	DR0003	3. With respect to any potential DWSD Transaction and any potential privatization transaction for DWSD that has been discussed with or considered by the City within the last 18 months, produce all term sheets, communications, proposals, working drafts, financial analyses of proposed transactions, and documents relating to the proposed uses of funds to be received as a result of any such DWSD Transaction.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u> Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
502	Detroit Water and Sewerage Department (DWSD)	Monetization	Retirement Systems	DR0026	26. Produce all documents relating to any potential public-private partnership with respect to the DWSD, as described in Section VIII.K.1.(b) of the Disclosure Statement.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
503	Detroit Water and Sewerage Department (DWSD)	Monetization	Sole	DR0018	Any and all correspondence, offers, bids, etc., to any private entity in connection with the possible sale of the Detroit Water and Sewerage Department.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
504	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0033	Documents evincing all communications between or among the City, DWSD, union or other labor representatives for employees of DWSD, and any other parties regarding a potential disposition or "monetization" of the Systems.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water
505	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0036	Documents relating to the prospect of forming or plan to form any regional authority or private enterprise to operate, manage, and/or own the Systems.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water Supplemental Review/Production Currently Underway (Regarding GLWA)
506	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0037	Documents evincing all rate-setting agreements and negotiations regarding the same with all municipal counterparties, including, but not limited to, Clinton County, Macomb County, Oakland County, and Wayne County.	Sanjay Marken, Conway MacKenzie, and the Department of Water, but the City is not aware of any responsive, non-privileged documents.
507	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0038	Documents evincing negotiations, agreements or understandings with any municipal counterparties, including, without limitation, Clinton County, Macomb County, Oakland County, Wayne County, and any other County or entity (public or private) regarding disposition or "monetization" of the Systems or altering rates chargeable by the Systems.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water Supplemental Review/Production Currently Underway (Regarding GLWA)
508	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0039	Documents containing any opinion, assessment, report or analysis of the City's or DWSD's ability to reject or unilaterally modify, on a non-consensual basis, any of the agreements with the municipal counterparties.	Sanjay Marken, Conway MacKenzie, and Department of Water, but the City is not aware of any responsive, non-privileged documents.
509	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0040	Documents referring to any alternatives the municipal counterparties have to DWSD's water and/or sewer services.	Sanjay Marken Conway MacKenzie Department of Water

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
510	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0041	Documents sent to, received by, or made available for inspection by parties participating in the Request for Information for Potential Operators of Detroit Water and Sewage Disposal Systems for Detroit Water and Sewerage Department ("DWSD"), issued by The City of Detroit and Kevyn D. Orr, Emergency Manager, requesting initial responses by April 7, 2014, including, but not limited to, any confidential information memoranda provided to such parties.	Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
511	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0057 (2d)	Documents evincing all rate-setting agreements and negotiations regarding the same with all municipal counterparties, including, but not limited to, Genesee County.	Sanjay Marken, Conway MacKenzie, and Department of Water, but the City is not aware of any responsive, non-privileged documents.
512	Detroit Water and Sewerage Department (DWSD)	Monetization	U.S. Bank	DR0058 (2d)	Documents evincing negotiations, agreements or understandings with any municipal counterparties, including, without limitation, Genesee County, and any other County or entity (public or private) regarding disposition or "monetization" of the Systems or altering rates chargeable by the Systems.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
513	Detroit Water and Sewerage Department (DWSD)	Monetization - GLWA Proposed Governance Structure	Oakland	DR0040	40. Documents that reflect the proposed governance structure of the GLWA.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
514	Detroit Water and Sewerage Department (DWSD)	Monetization - Legal Analysis	Macomb County	DR0001	REQUEST NO. 1: All documents relating to any analyses regarding the legality of each of the DWSD Options under federal, state, or local law.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
515	Detroit Water and Sewerage Department (DWSD)	Monetization - Legal Analysis	Macomb County	DR0002	REQUEST NO. 2: All documents relating to any analyses conducted in connection with whether the DWSD Options require electoral approval.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire Department of Water <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
516	Detroit Water and Sewerage Department (DWSD)	Monetization - Legal Analysis	Macomb County	DR0042	REQUEST NO. 42: All documents containing any opinion, assessment, report or analysis of the City's or DWSD's ability to reject or unilaterally modify, on a non-consensual basis, any of the agreements with the Counties.	Sanjay Marken, Conway MacKenzie, and Department of Water, but the City is not aware of any responsive, non-privileged documents.
517	Detroit Water and Sewerage Department (DWSD)	Monetization - Legal Authority to Privatize	Sole	DR0017	17. Any and all documents that establish the authority of the Emergency Manager to privatize or sell the Detroit Water and Sewerage Department.	Kevin Haggard Sanjay Marken Conway MacKenzie Ken Buckfire

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
518	Detroit Water and Sewerage Department (DWSD)	Monetization - RFP for Potential Operators	Oakland	DR0034	34. Documents sent to, received by, or made available for inspection by parties participating in the Request for Information for Potential Operators of Detroit Water and Sewerage Disposal Systems for Detroit Water and Sewerage Department (DWSD) ("DWSD"), issued by The City of Detroit and Kevyn D. Orr, Emergency Manager, requesting initial responses by April 7, 2014, including, but not limited to, any confidential information memoranda provided to such parties.	Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
519	Detroit Water and Sewerage Department (DWSD)	Monetization - Will DWSD be stand alone?	Oakland	DR0041	41. Documents that reflect whether DWSD or GLWA will be a "stand-alone" enterprise with or without a DWSD Transaction, such that all administrative functions, such as human resources, information technology, and legal services, will be performed exclusively within the enterprise.	Sanjay Marken Conway MacKenzie Department of Water
520	Detroit Water and Sewerage Department (DWSD)	Not for Profit Status	Macomb County	DR0003	REQUEST NO. 3: All documents relating to whether DWSD is a not-for-profit entity, including but not limited to whether DWSD is prohibited from making a profit.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
521	Detroit Water and Sewerage Department (DWSD)	OHM Advisors Capital Plan	EEPK FMS WT FGIC	DR0079	79. The OHM Advisors Capital Plan, together with any exhibits or other documents attached thereto.	Ken Buckfire Sanjay Marken Conway MacKenzie Department of Water
522	Detroit Water and Sewerage Department (DWSD)	OMI - Detroit Agreement	Macomb County	DR0038	REQUEST NO. 38: All documents relating to the OMI-Detroit Agreement, including but not limited to any documents regarding the rejection, assumption, or assignment of the OMI-Detroit Agreement.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
523	Detroit Water and Sewerage Department (DWSD)	OMI - Detroit Agreement	Macomb County	DR0039	REQUEST NO. 39: All documents relating to any analyses conducted regarding the OMI-Detroit Agreement with respect to each of the DWSD Options.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
524	Detroit Water and Sewerage Department (DWSD)	OMI - Detroit Agreement	Macomb County	DR0040	REQUEST NO. 40: All documents identifying any potential counterparties to an assignment of the OMI-Detroit Agreement.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
525	Detroit Water and Sewerage Department (DWSD)	OMI - Detroit Agreement	Macomb County	DR0041	REQUEST NO. 41: All documents relating to any meetings, negotiations, discussions or communications with any potential counterparties to an assignment of the OMI-Detroit Agreement.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
526	Detroit Water and Sewerage Department (DWSD)	OMI - Detroit Agreement	Macomb County	DR0043	REQUEST NO. 43: All documents relating to or reflecting the City's ability to provide adequate assurance of future performance under the OMI-Detroit Agreement.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
527	Detroit Water and Sewerage Department (DWSD)	Operational Structure	EEPK FMS WT FGIC	DR0082	82. All Documents and Communications concerning the operational structure of the DWSD, including, without limitation, all documents concerning the management, corporate governance, and/or outsourcing proposals for the DWSD.	Kevin Haggard Sanjay Marken Conway MacKenzie Department of Water
528	Detroit Water and Sewerage Department (DWSD)	Org Chart	Macomb County	DR0037	REQUEST NO. 37: The current organizational chart for DWSD and any proposed changes to occur on or after the Effective Date (as defined in the Plan).	Kevin Haggard Sanjay Marken Conway MacKenzie Department of Water

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
529	Detroit Water and Sewerage Department (DWSD)	Org Chart	Oakland	DR0047	47. The current organizational chart for DWSD and any proposed changes to occur on or after the Effective Date (as defined in the Plan).	Kevin Haggard Sanjay Marken Conway MacKenzie Department of Water
530	Detroit Water and Sewerage Department (DWSD)	Org Chart	U.S. Bank	DR0054	The current organizational chart for DWSD and any proposed changes to occur on or after the Effective Date (as defined in the Plan).	Kevin Haggard Sanjay Marken Conway MacKenzie Department of Water
531	Detroit Water and Sewerage Department (DWSD)	Org Charts	DWSD Discovery Parties	DR0054	54. Charts or other Documents showing, or sufficient to show, the current organizational structure of the Systems, and the names and positions of key employees, and any proposed changes to occur upon the Effective Date of the Plan.	Kevin Haggard Sanjay Marken Conway MacKenzie Department of Water
532	Detroit Water and Sewerage Department (DWSD)	Projections	DWSD Discovery Parties	DR0010	10. All Documents, including those concerning any related support and assumptions, for the Systems relating to the City's Ten-Year Financial Projections (through Fiscal Year 2023), including: a. The financial impact, timing and other matters relating to the potential departure of any municipal entity; b. Any planned, proposed or projected rate determinations; c. Any planned, proposed or projected Capital Improvement Projects and the proposed source of funding for any such projects; d. Any planned or projected financing difficulties; e. Any planned or projected changes in borrowing costs, and the resulting impact; f. Any planned or projected collection issues; g. Growth rates relevant to income tax revenue projections; h. The cost of services for the Systems; i. Historical collection rates and amounts for customers by class; and j. Administrative and operational expenses.	Ernst & Young Conway MacKenzie
533	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0005i-v	REQUEST NO. 5: All documents showing financial projections prepared by DWSD management, the City, the Emergency Manager, or any of their respective financial advisors or agents for any of Fiscal Years 2014 through 2023, including but not limited projections prepared on or about December 2013, including but not limited to: i. projected statements of income and cash flow and back-up documentation showing the supporting bases for such projections; ii. notes to the projected financial statements; iii. projected volumetric use, revenue and rate tariff by customer rate class and service/geographic area and back-up documentation showing the supporting bases for such projections; iv. documents showing any other projected sources of revenue and back-up information sufficient to show the bases for such projections; v. any disbursements for administration, operation, maintenance, and capital expenditures sufficient to show the bases and assumptions underlying such items on an individual basis;	Conway MacKenzie Mike Hausman

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
534	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0005vii-viii	All documents showing financial projections prepared by DWSD management, the City, the Emergency Manager, or any of their respective financial advisors or agents for any of Fiscal Years 2014 through 2023, including but not limited to projections prepared on or about December 2013, including but not limited to: vii. to the extent not provided in response to the requests above, documents sufficient to show projections related to pension expense, labor expense by category; operating expense by category (i.e. power, chemicals, etc.); disbursements from DWSD to other City Departments, to the City's General Fund, or to any retirement plan for City employees; costs for employee healthcare, insurance and other benefits; costs for pension and other postemployment benefits; employee headcount; bad debt expense by customer rate class and/or wholesale customer; and refinancing and future financing; and viii. documents relating to projected cash flows to and from DWSD and any other City Department or the City's General Fund.	Conway MacKenzie Michael Hausman
535	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0006i-v	REQUEST NO. 6: All documents showing financial projections relating to DWSD, if it remains a department of the City, prepared by DWSD Management, the City, the Emergency Manager, or any of their respective financial advisors or agents for any of Fiscal Years 2014 through 2023, including but not limited to: i. projected statements of income and cash flow and back-up documentation showing the supporting bases for such projections; ii. notes to the projected financial statements; iii. projected volumetric use, revenue and rate tariff by customer rate class and service/geographic area and back-up documentation showing the supporting bases for such projections; iv. documents showing any other projected sources of revenue and back-up information sufficient to show the bases for such projections; v. any disbursements for administration, operation, maintenance, and capital expenditures sufficient to show the bases and assumptions underlying such items on an individual basis;	Conway MacKenzie Michael Hausman
536	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0006vi-viii	All documents showing financial projections relating to DWSD, if it remains a department of the City, prepared by DWSD Management, the City, the Emergency Manager, or any of their respective financial advisors or agents for any of Fiscal Years 2014 through 2023, including but not limited to: vi. any disbursements from the gross revenues of each System which will not be used for the operation, maintenance, or capital expenditures of such System; vii. to the extent not provided in response to the requests above, documents sufficient to show projections related to pension expense, labor expense by category; operating expense by category (i.e. power, chemicals, etc.); disbursements from DWSD to other City Departments, to the City's General Fund, or to any retirement plan for City employees; costs for employee healthcare, insurance and other benefits; costs for pension and other postemployment benefits; employee headcount; bad debt expense by customer rate class and/or wholesale customer; and refinancing and future financing; and viii. documents relating to projected cash flows to and from DWSD and any other City Department or the City's General Fund.	Conway MacKenzie Michael Hausman

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
537	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0007i-v	REQUEST NO. 7: All documents showing financial projections relating to the Regional Authority prepared by DWSD Management, the City, the Emergency Manager, or any of their respective financial advisors or agents for any of Fiscal Years 2014 through 2023, including but not limited to: i. projected statements of income and cash flow and back-up documentation showing the supporting bases for such projections; ii. notes to the projected financial statements; iii. projected volumetric use, revenue and rate tariff by customer rate class and service/geographic area and back-up documentation showing the supporting bases for such projections; iv. documents showing any other projected sources of revenue and back-up information sufficient to show the bases for such projections; v. any disbursements for administration, operation, maintenance, and capital expenditures sufficient to show the bases and assumptions underlying such items on an individual basis;	Conway MacKenzie Michael Hausman Supplemental Review/Production Currently Underway (Regarding GLWA)
538	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0007vii	All documents showing financial projections relating to the Regional Authority prepared by DWSD Management, the City, the Emergency Manager, or any of their respective financial advisors or agents for any of Fiscal Years 2014 through 2023, including but not limited to: viii. documents relating to projected cash flows to and from DWSD and any other City Department or the City's General Fund.	Supplemental Review/Production Currently Underway (Regarding GLWA)
539	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0007vi-vii	All documents showing financial projections relating to the Regional Authority prepared by DWSD Management, the City, the Emergency Manager, or any of their respective financial advisors or agents for any of Fiscal Years 2014 through 2023, including but not limited to: vi. any disbursements from the gross revenues of each System which will not be used for the operation, maintenance, or capital expenditures of such System; vii. to the extent not provided in response to the requests above, documents sufficient to show projections related to pension expense, labor expense by category; operating expense by category (i.e. power, chemicals, etc.); disbursements from DWSD to other City Departments, to the City's General Fund, or to any retirement plan for City employees; costs for employee healthcare, insurance and other benefits; costs for pension and other postemployment benefits; employee headcount; bad debt expense by customer rate class and/or wholesale customer; and refinancing and future financing ; and	Conway MacKenzie Mikchael Hausman Supplemental Review/Production Currently Underway (Regarding GLWA)
540	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0008	REQUEST NO. 8: All documents reflecting or relating to any financial analyses relating to DWSD for future years, including but not limited to any financial projections and the bases for such projections.	Conway MacKenzie Michael Hausman Publicly Available Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
541	Detroit Water and Sewerage Department (DWSD)	Projections	Macomb County	DR0009	REQUEST NO. 9: All documents relating to the financial projections regarding the DWSD Options presented in Exhibit L, including but not limited to any assumptions employed in such financial projections.	Conway MacKenzie Michale Hausman

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
542	Detroit Water and Sewerage Department (DWSD)	Projections	Oakland	DR0002a-e	2. Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: a) Projected statements of income and cash flow and back-up documentation showing the supporting bases for such projections; b) Notes to the projected financial statements; c) Projected volumetric use, revenue and rate tariff by customer rate class and service/ geographic area and back-up documentation showing the supporting bases for such projections; d) Documents showing any other projected sources of revenue and back-up information sufficient to show the bases for such projections; e) Any disbursements from the gross revenues of each System which will be made for administration, operation, maintenance, and Capital Expenditures;	Conway MacKenzie Mike Hausman Supplemental Review/Production Currently Underway (Regarding GLWA)
543	Detroit Water and Sewerage Department (DWSD)	Projections	Oakland	DR0002f-h	2. Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: f) Any disbursements from the gross revenues of each System which will not be used for the operation, maintenance, or Capital Expenditures of such System; g) To the extent not provided in response to the requests above, Documents sufficient to show projections related to pension expense; labor expense by category; operating expenses by category (i.e. power, chemicals, etc.); disbursements from DWSD to other City departments, to the City's General Fund, or to any retirement plan for City employees; costs for employee healthcare, insurance and other benefits; costs for pension and other postemployment benefits; employee headcount; bad debt expense by customer rate class and/ or wholesale customer; days sales outstanding; accounts receivable aging; and refinancing and future financing; and h) Documents relating to projected cash flows to and from DWSD and any other City department or the City's General Fund.	Conway MacKenzie Michael Hausman Supplemental Review/Production Currently Underway (Regarding GLWA)
544	Detroit Water and Sewerage Department (DWSD)	Projections	Oakland	DR0020	20. Documents detailing any anticipated Material Capital Expenditures to be funded after Fiscal Year 2024.	Conway MacKenzie Michael Hausman Department of Water, but the City is in possession of no responsive documents.
545	Detroit Water and Sewerage Department (DWSD)	Projections	Oakland	DR0021	21. Documents reflecting any opinion, assessment, estimate or study which has assessed the Capital Expenditure needs of the Systems that are more current than DWSD's 10-year CIP (Capital Improvement Program) dated September 24, 2013.	Kevin Haggard Sanjay Marken Michael Hausman Conway MacKenzie Department of Water Publicly Available (see, e.g., http://www.dwsd.org/downloads_n/about_dwsd/bowc/presentations/FY_2015_CIP_BOWC_Workshop_REVISIED_Presentation_12-4-2013_final.pdf)
546	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0009-A	Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: a) Projected statements of income and cash flow and back-up documentation showing the supporting bases for such projections;	Conway MacKenzie Supplemental Review/Production Currently Underway (Regarding GLWA)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
547	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0009-B	Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: b) Notes to the projected financial statements;	Sanjay Marken Supplemental Review/Production Currently Underway (Regarding GLWA)
548	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0009-C	Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: c) Projected volumetric use, revenue and rate tariff by customer rate class and service/geographic area and back-up documentation showing the supporting bases for such projections;	Sanjay Marken Supplemental Review/Production Currently Underway (Regarding GLWA)
549	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0009-D	Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: d) Documents showing any other projected sources of revenue and back-up information sufficient to show the bases for such projections;	Sanjay Marken Supplemental Review/Production Currently Underway (Regarding GLWA)
550	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0009-E	Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: e) Any disbursements from the gross revenues of each System which will be made for administration, operation, maintenance, and Capital Expenditures;	Conway MacKenzie Mike Hausman Supplemental Review/Production Currently Underway (Regarding GLWA)
551	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0009-F	Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: f) Any disbursements from the gross revenues of each System which will not be used for the operation, maintenance, or Capital Expenditures of such System;	Conway MacKenzie Michael Hausman Supplemental Review/Production Currently Underway (Regarding GLWA)
552	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0009-G	Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: g) To the extent not provided in response to the requests above, Documents sufficient to show projections related to pension expense; labor expense by category; operating expenses by category (i.e. power, chemicals, etc.); disbursements from DWSD to other City Departments, to the City's General Fund, or to any retirement plan for City employees; costs for employee healthcare, insurance and other benefits; costs for pension and other postemployment benefits; employee headcount; bad debt expense by customer rate class and/or wholesale customer; days sales outstanding; accounts receivable aging; and refinancing and future financing;	Sanjay Marken Supplemental Review/Production Currently Underway (Regarding GLWA)
553	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0009-H	Documents showing DWSD and GLWA's financial projections for Fiscal Years 2014 through 2023. This request includes, but is not limited to: h) Documents relating to projected cash flows to and from DWSD and any other City Department or the City's General Fund.	Sanjay Marken Supplemental Review/Production Currently Underway (Regarding GLWA)
554	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0027	Documents detailing any anticipated Material Capital Expenditures to be funded after Fiscal Year 2024.	Conway MacKenzie Michael Hausman Department of Water, but the City is in possession of no responsive documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
555	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0028	Documents reflecting any opinion, assessment, estimate or study which has assessed the Capital Expenditure needs of the Systems that are more current than DWSD's 10-year CIP (Capital Improvement Program) dated September 24, 2013.	Kevin Haggard Sanjay Marken Michael Hausman Conway MacKenzie Department of Water Publicly Available (see, e.g., http://www.dwsd.org/downloads_n/about_dwsd/bowc/presentations/FY_2015_CIP_BOWC_Workshop_REVISED_Presentation_12-4-2013_final.pdf)
556	Detroit Water and Sewerage Department (DWSD)	Projections	U.S. Bank	DR0048	Documents that reflect whether DWSD or GLWA will be a "stand-alone" enterprise with or without a DWSD Transaction, such that all administrative functions, such as human resources, information technology, and legal services, will be performed exclusively within the enterprise.	Sanjay Marken Conway MacKenzie Department of Water
557	Detroit Water and Sewerage Department (DWSD)	Projections - Capital Expenditures	DWSD Discovery Parties	DR0036	36. All Documents reflecting any assessment of the Capital Expenditure needs of the Systems that are more current than DWSD's 10-year CIP (Capital Improvement Program) dated September 24, 2013.	Kevin Haggard Sanjay Marken Michael Hausman Conway MacKenzie Department of Water Publicly Available (see, e.g., http://www.dwsd.org/downloads_n/about_dwsd/bowc/presentations/FY_2015_CIP_BOWC_Workshop_REVISED_Presentation_12-4-2013_final.pdf)
558	Detroit Water and Sewerage Department (DWSD)	Projections - Capital Expenditures	DWSD Discovery Parties	DR0044	44. Documents sufficient to show any anticipated capital expenditures for the Systems to be funded after Fiscal Year 2024.	Conway MacKenzie Michael Hausman Department of Water, but the City is in possession of no responsive documents.
559	Detroit Water and Sewerage Department (DWSD)	Projections - Exhibit L	Macomb County	DR0010	REQUEST NO. 10: All documents reflecting or relating to the Miller Buckfire Analysis referenced in Exhibit L that resulted in a 4.53% interest rate estimate for future borrowings.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie
560	Detroit Water and Sewerage Department (DWSD)	Proposed GWLA Structure	U.S. Bank	DR0047	Documents that reflect the proposed governance structure of the GLWA.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie <u>Supplemental Review/Production Currently Underway (Regarding GLWA)</u>
561	Detroit Water and Sewerage Department (DWSD)	Rate Agreement	EEPK FMS WT FGIC	DR0081	81. All Documents and Communications concerning a rate agreement between the City and the DWSD.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
562	Detroit Water and Sewerage Department (DWSD)	Rate Stability Program	DWSD Discovery Parties	DR0012	12. All Documents relating to the proposed DWSD "rate stability program" for City residents to enhance affordability of retail rates as described on page 48 of the Plan.	Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
563	Detroit Water and Sewerage Department (DWSD)	Rates	DWSD Discovery Parties	DR0011	11. All Documents relating to rate-setting computations for both wholesale and retail rates for the Systems from January 1, 2009 to the present, including rate calculations or support for any rate increases, agreements and negotiations regarding rate setting and any reconciliation(s) with anticipated capital needs.	Sanjay Marken Conway MacKenzie Department of Water

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
564	Detroit Water and Sewerage Department (DWSD)	Rates	Macomb County	DR0044	REQUEST NO. 44: All documents relating to procedures used or to be used to determine the System rates charged for water and/or sewage services under each of the DWSD Options.	Sanjay Marken Conway MacKenzie Department of Water
565	Detroit Water and Sewerage Department (DWSD)	Rates	Macomb County	DR0045	REQUEST NO. 45: All documents prepared on or after January 1, 2013 reflecting any study, assessment, estimate or opinion regarding future System rates, capital expenditures, volumes by customer rate class and service/geographic location, and/or operating expenses.	Sanjay Marken Conway MacKenzie Department of Water
566	Detroit Water and Sewerage Department (DWSD)	Rates	Macomb County	DR0048	REQUEST NO. 48: Documents evincing the number of "retail" customer accounts (customers other than wholesale) for Fiscal Years 2009 through 2013 and projections for Fiscal Years 2014 through 2023.	Sanjay Marken Conway MacKenzie Department of Water
567	Detroit Water and Sewerage Department (DWSD)	Rates	Macomb County	DR0049	REQUEST NO. 49: All documents relating to water and sewer service rates, including but not limited to i. documents reflecting support for the statement in the Amended Disclosure Statement that rates will increase by 4% per year until 2023; ii. documents providing a basis for whether a 4% rate increase per year until 2023 complies with the terms of the OMI-Detroit Agreement; iii. documents reflecting or relating to whether, if the DWSD remains a department of the City, the DWSD will maintain Fiscal Year 2015 rate setting protocols for a minimum of five years, subject to certain changes necessary to stabilize water and sewer revenues; and iv. documents reflecting or relating to any proposed or planned rate stability program for City residents and whether such a program may provide for affordability of retail rates to be taken into account in the development of wholesale rates across the system.	Sanjay Marken Conway MacKenzie Department of Water
568	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0003	3. The most recent cost of services study done for the City regarding each of the Systems.	Sanjay Marken, Conway MacKenzie, Department of Water, but the City is not aware of any responsive, non-privileged documents. Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
569	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0004	4. Documents showing the average and median bills by customer rate class, including customer rate classes in the surrounding counties and cities.	Sanjay Marken Conway MacKenzie Department of Water
570	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0005	5. Documents reflecting any study, assessment, estimate or opinion regarding historical or future System rates, Capital Expenditures, volumes by customer rate class and service/ geographic location, and/ or operating expenses.	Sanjay Marken Conway MacKenzie Department of Water
571	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0006	6. All work done by DWSD's rate consultant in conjunction with DWSD's Root Cause Committee's Final Report, dated as of March 13, 2013, and referenced on page 4 of that report.	Sanjay Marken Conway MacKenzie Department of Water
572	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0008	8. Documents evincing the number of customer accounts by customer rate class for Fiscal Years 2009 through 2013 and projections for Fiscal Years 2014 through 2023.	Sanjay Marken Conway MacKenzie Department of Water
573	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0009	9. Documents evincing the City and/ or DWSD's historical and current process of billing and collecting for each System.	Sanjay Marken Conway MacKenzie Department of Water
574	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0028	28. Documents evincing all rate-setting agreement and negotiations regarding the same with all municipal counterparties, including but not limited to, Clinton County, Macomb County, Oakland County, and Wayne County.	Sanjay Marken, Conway MacKenzie, Department of Water, but the City is aware of no responsive, non-privileged documents. Supplemental Review/Production Currently Underway (Regarding GLWA)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
575	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0030	30. Documents evincing all rate-setting agreements and negotiations regarding the same with all municipal counterparties, including, but limited to Clinton County, Macomb County, Oakland County, and Wayne County.	Sanjay Marken, Conway MacKenzie, Department of Water, but the City is aware of no responsive, non-privileged documents. Supplemental Review/Production Currently Underway (Regarding GLWA)
576	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0033	33. Documents referring to any alternatives the municipal counterparties have to DWSD's water and/ or sewer services.	Department of Water Supplemental Custodians (Collection Currently Underway): Sue McCormick, Nicolette Bateson and William Wolfson.
577	Detroit Water and Sewerage Department (DWSD)	Rates	Oakland	DR0049	49. Documents evincing all rate-setting agreements and negotiations regarding the same with all municipal counterparties, including, but not limited to, Genesee County.	Sanjay Marken, Conway MacKenzie, Department of Water, but the City is aware of no responsive, non-privileged documents. Supplemental Review/Production Currently Underway (Regarding GLWA)
578	Detroit Water and Sewerage Department (DWSD)	Rates	U.S. Bank	DR0012	Documents reflecting any study, assessment, estimate or opinion regarding historical or future System rates, Capital Expenditures, volumes by customer rate class and service/geographic location, and/or operating expenses.	Sanjay Marken Conway MacKenzie Department of Water
579	Detroit Water and Sewerage Department (DWSD)	Rates	U.S. Bank	DR0035	Documents evincing all rate-setting agreements and negotiations regarding the same with all municipal Counterparties, including, but not limited to, Clinton County, Macomb County, Oakland County, and Wayne County.	Sanjay Marken, Conway MacKenzie, Department of Water, but the City is aware of no responsive, non-privileged documents. Supplemental Review/Production Currently Underway (Regarding GLWA)
580	Detroit Water and Sewerage Department (DWSD)	Rates - Billing and Collection	DWSD Discovery Parties	DR0039	39. Documents sufficient to show the City and/or DWSD's historical and current process of billing and collecting for the Systems.	Sanjay Marken Conway MacKenzie Department of Water
581	Detroit Water and Sewerage Department (DWSD)	Rates - Billing and Collection	U.S. Bank	DR0016	Documents evincing the City and/or DWSD's historical and current process of billing and collecting for each System.	Sanjay Marken Conway MacKenzie Department of Water
582	Detroit Water and Sewerage Department (DWSD)	Rates - Bills	DWSD Discovery Parties	DR0040	40. Documents sufficient to show the average and median bills for the Systems by customer rate class, including customer rate classes for the City and for each of the surrounding areas where the Systems provide services.	Sanjay Marken Conway MacKenzie Department of Water
583	Detroit Water and Sewerage Department (DWSD)	Rates - Bills	U.S. Bank	DR0011	Documents showing the average and median bills by customer rate class, including customer rate classes in the surrounding counties and cities.	Sanjay Marken Conway MacKenzie Department of Water
584	Detroit Water and Sewerage Department (DWSD)	Rates - Customer Accounts by Class	DWSD Discovery Parties	DR0041	41. Documents sufficient to show the number of customer accounts for the Systems by customer class for Fiscal Years 2009 through 2013 and any projection prepared by the City or the Systems for Fiscal Years 2014 through 2023.	Sanjay Marken Conway MacKenzie Department of Water
585	Detroit Water and Sewerage Department (DWSD)	Rates - Customer Accounts by Class	U.S. Bank	DR0015	Documents evincing the number of customer accounts by customer rate class for Fiscal Years 2009 through 2013 and projections for Fiscal Years 2014 through 2023.	Sanjay Marken Conway MacKenzie Department of Water
586	Detroit Water and Sewerage Department (DWSD)	Rates - Root Cause Committee	Macomb County	DR0046	REQUEST NO. 46: All documents reflecting or relating to work done by DWSD's rate consultant in conjunction with DWSD's Root Cause Committee's Final Report, dated as of March 13, 2013, and referenced on page 4 of that report.	Sanjay Marken Conway MacKenzie Department of Water
587	Detroit Water and Sewerage Department (DWSD)	Rates - Root Cause Committee	U.S. Bank	DR0013	All work done by DWSD's rate consultant in conjunction with DWSD's Root Cause Committee's Final Report, dated as of March 13, 2013, and referenced on page 4 of that report.	Sanjay Marken Conway MacKenzie Department of Water

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
588	Detroit Water and Sewerage Department (DWSD)	RFI	DWSD Discovery Parties	DR0019	19. All Documents relating to the DWSD RFI, including all responses thereto.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Department of Water Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
589	Detroit Water and Sewerage Department (DWSD)	RFI	Retiree Association	DR0049	49. All proposals submitted to the City in response to the City's request for information as to the potential public-private partnership for the operation and management of the DWSD as referenced in Section VIII.K.1.b of the Amended Disclosure Statement.	Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
590	Detroit Water and Sewerage Department (DWSD)	RFI	Retiree Association	DR0050	50. All documents reflecting or showing the City's analysis or evaluation of a potential public-private partnership for the operation and management of the DWSD as referenced in Section VIII.K.1.b of the Amended Disclosure Statement, including any analysis of proposals submitted to the City in response to the City's request for information.	Kevin Haggard Sanjay Marken Ken Buckfire Conway MacKenzie Department of Water Pursuant to the Court's May 12, 2014 ruling, documents relating to the RFP for a private operator are commercially sensitive and need not be produced at this time.
591	Detroit Water and Sewerage Department (DWSD)	RFP	DWSD Discovery Parties	DR0056	56. All Documents relating to the Underwriting RFP, including all responses thereto.	Amanda Van Dusen Department of Water
592	Detroit Water and Sewerage Department (DWSD)	RFP	Macomb County	DR0013	REQUEST NO. 13: All documents sent to, received by, or made available for inspection by parties participating in the Request for Proposal for Underwriting Services, issued by the Michigan Department of Treasury and the Michigan Finance Authority (on behalf of the City of Detroit and the Detroit Water and Sewerage Department), dated as of March 12, 2014.	Van Dusen Department of Water
593	Detroit Water and Sewerage Department (DWSD)	RFP by State	Oakland	DR0048	48. Documents sent to, received by, or made available for inspection by parties participating in the Request for Proposal for Underwriting Services, issued by The Michigan Department of Treasury and the Michigan Finance Authority (on behalf of the City of Detroit and the Detroit Water and Sewerage Department), dated as of March 12, 2014.	Van Dusen Department of Water
594	Detroit Water and Sewerage Department (DWSD)	RFP by State	U.S. Bank	DR0055	Documents sent to, received by, or made available for inspection by parties participating in the Request for Proposal for Underwriting Services, issued by The Michigan Department of Treasury and the Michigan Finance Authority (on behalf of the City of Detroit and the Detroit Water and Sewerage Department), dated as of March 12, 2014.	Van Dusen Department of Water
595	Detroit Water and Sewerage Department (DWSD)	Third Party Assessments	EEPK FMS WT FGIC	DR0080	80. All system assessments, projections, and/or capital plans prepared by third parties (other than the Conway MacKenzie Business Plan, OHM Advisors Capital Plan, and the Foster Group Feasibility Report) concerning the DWSD.	Amanda Van Dusen Department of Water

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
596	Disclosure Statement of Plan	Ability to Confirm	Retiree Committee	DR0035	All documents explaining, discussing, describing, showing or analyzing whether: (a) the City is "not prohibited by law from taking any action necessary to carry out the Plan" pursuant to 11 U.S.C. § 943(b)(4), (b) the Amended Plan is in the "best interest of creditors" pursuant to 11 U.S.C. § 943(b)(7), (c) the Amended Plan meets, or fails to meet, the feasibility requirement of 11 U.S.C. § 943(b)(7), and/or (d) the Amended Plan meets, or fails to meet the confirmation requirements of 11 U.S.C. § 1129(b), including but not limited to the requirements that the Amended Plan "not discriminate unfairly" and that the plan be "fair and equitable."	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
597	Disclosure Statement or Plan	Ability to Confirm	Ambac	DR0013	All documents and communications that tend to support or refute that the City will be able to confirm the Plan pursuant to Section 1129(b) of the Bankruptcy Code.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
598	Disclosure Statement or Plan	Ability to Confirm	Ambac	DR0014	All communications between the City and any witness that relate to the City's ability to confirm the Plan.	All communications with any witness/custodian are contained in that witness/custodian's documents.
599	Disclosure Statement or Plan	Best Interest of Creditors	EEPK FMS WT FGIC	DR0022	22. All Documents and Communications concerning the City's ability to satisfy its burden that the Plan is in the "best interest of creditors" within the meaning of section 943(b)(7) of the Bankruptcy Code.	Ernst & Young
600	Disclosure Statement or Plan	Best interests of creditors	Ambac	DR0009	All documents and communications that tend to support or refute that the Plan is in the "best interest of creditors" within the meaning of 11 U.S.C. § 943(b)(7).	Ernst & Young
601	Disclosure Statement or Plan	Communications with City	Ambac	DR0100	All documents provided to and any communications with officials of the City or the City Council that relate to the preparation or drafting of and/or content contained in the Disclosure Statement or Plan.	Kevyn Orr Sonya Mays Stacy Fox John Hill
602	Disclosure Statement or Plan	Communications with State	Ambac	DR0101	All documents provided to and any communications with the State that relate to the preparation or drafting of and/or content contained in the Disclosure Statement or Plan.	Kevyn Orr Sonya Mays
603	Disclosure Statement or Plan	Drafting - communications	DWSD Discovery Parties	DR0065	65. All Documents constituting or reflecting Communications that relate to the preparation or drafting of and/or content contained in the Disclosure Statement or Plan.	Conway MacKenzie Ernst & Young Ken Buckfire Kyle Herman Jim Doak Sanjay Marken Kevyn Orr Sonya Mays Stacy Fox John Hill
604	Disclosure Statement or Plan	Drafting - communications	DWSD Discovery Parties	DR0066	66. All Documents constituting or reflecting Communications with City Officials that relate to the preparation or drafting of and/or content contained in the Disclosure Statement or Plan.	Kevyn Orr Sonya Mays Stacy Fox John Hill
605	Disclosure Statement or Plan	Feasibility	Ambac	DR0010	All documents and communications that tend to support or refute that the Plan is feasible within the meaning of 11 U.S.C. § 943(b)(7).	Ernst & Young
606	Disclosure Statement or Plan	Feasibility	EEPK FMS WT FGIC	DR0023	23. All Documents and Communications concerning the City's ability to satisfy its burden that the Plan is feasible within the meaning of section 943(b)(7) of the Bankruptcy Code.	Ernst & Young
607	Disclosure Statement Or Plan	Good Faith	Retiree Association	DR0007	7. All memoranda or communications prepared by an employee, agent, officer, or representative of Debtor or the Emergency Manager regarding whether the Plan was or was not proposed in good faith.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
608	Disclosure Statement or Plan	Legal Standard	Retirement Systems	DR0040	40. Produce all documents that either support or refute that the City can satisfy its burden under 11 U.S.C. § 1129(a) as incorporated into chapter 9 of the Bankruptcy Code; that the Plan is in the 'best interest of creditors' within the meaning of 11 U.S.C. § 943(b)(7); that the Plan is feasible with the meaning of 11 U.S.C. § 943(b)(7); that the City is not prohibited by law from taking any action necessary to carry out the Plan within the meaning of 11 U.S.C. § 943(b)(4); that, under 11 U.S.C. § 943(b)(6), any regulatory or electoral approval necessary under applicable nonbankruptcy law in order to carry out any provision of the plan has been obtained, or such provision is expressly conditioned on such approval; and that the City will be able to confirm the Plan pursuant to Sections 1129(b) of the Bankruptcy Code.	Ernst & Young
609	Disclosure Statement or Plan	Legal Standard - Bankruptcy Code § 1129(a)	Ambac	DR0008	All documents and communications that tend to support or refute that the City can satisfy its burden under 11 U.S.C. § 1129(a) as incorporated into Chapter 9 of the Bankruptcy Code.	Ernst & Young
610	Disclosure Statement or Plan	Legal Standard - Bankruptcy Code § 1129(a)	EEPK FMS WT FGIC	DR0018	18. All Documents and Communications concerning the City's ability to satisfy its burden under section 1129(a) of the Bankruptcy Code, as incorporated into chapter 9 of the Bankruptcy Code.	Ernst & Young
611	Disclosure Statement or Plan	Legal Standard - Bankruptcy Code § 1129(a)	EEPK FMS WT FGIC	DR0019	19. All Documents and Communications concerning the City's ability to satisfy its burden that the Plan is "fair and equitable" and does not "discriminate unfairly" under section 1129(b) of the Bankruptcy Code, as incorporated into chapter 9 of the Bankruptcy Code.	Ernst & Young
612	Disclosure Statement or Plan	Legal Standard - Bankruptcy Code § 943(b)	EEPK FMS WT FGIC	DR0020	20. All Documents and Communications concerning the City's ability to satisfy its burden under section 943(b) of the Bankruptcy Code.	Ernst & Young
613	Disclosure Statement or Plan	Legal Standard of 11 U.S.C. § 1129(a)	DWSD Discovery Parties	DR0061	61. All Documents that support or relate to the City's contention, if it so contends, that it can satisfy its burden under 11 U.S.C. § 1129(a) as incorporated into Chapter 9 of the Bankruptcy Code.	Ernst & Young
614	Disclosure Statement or Plan	Legal Standard of 11 U.S.C. § 943(b)	DWSD Discovery Parties	DR0062	62. All Documents that support or relate to the City's contention, if it so contends, that it can satisfy the requirements under 11 U.S.C. § 943(b).	Not Applicable
615	Disclosure Statement or Plan	Prohibited by Law	Ambac	DR0012	All documents and communications that tend to support or refute that the City is not prohibited by law from taking any action necessary to carry out the Plan within the meaning of 11 U.S.C. § 943(b)(4).	Not Applicable
616	Disclosure Statement or Plan	Prohibited by Law	EEPK FMS WT FGIC	DR0024	24. All Documents and Communications concerning whether the City is prohibited by law from taking any action necessary to carry out the Plan within the meaning of section 943(b)(4) of the Bankruptcy Code.	Not Applicable
617	Disclosure Statement or Plan [See also, State, Necessary Legislation]	Necessary Legislation	Retirement Systems	DR0022	22. Produce all documents relating to any proposed or anticipated modifications or amendments to any ordinance, statute, City Charter, and the like, as well as any other potential legislative changes relating to or required for implementation of the Plan.	Not Applicable
618	Discolosure Statement or Plan	Unfair Discrimination	Retiree Association	DR0016	16. All memoranda or communications prepared by an employee, agent, officer, or representative of Debtor or the Emergency Manager regarding whether the Plan does or does not discriminate unfairly.	Not Applicable
619	Emergency Manager	Completion of term	EEPK FMS WT FGIC	DR0167	167. All Documents and Communications concerning and related to the completion of Kevyn Orr's 18-month term as emergency manager pursuant to Public Act 436.	Kevyn Orr
620	Emergency Manager	Correspondence with SEC	Sole	DR0014	14. Any and all correspondence between Emergency Manager Kevyn Orr and the Securities and Exchange Commission.	Kevyn Orr

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
621	Employment	Declines	Ambac	DR0098-A	All documents and communications that tend to support or refute the following statements contained in the Disclosure Statement: A. The charts and accompanying text on pages 39-42 purporting to show declines in revenue, income taxes, state shared revenue, and employment.	Conway MacKenzie
622	Expense Reduction	Deferral of Spending	Ambac	DR0049	All documents and communications analyzing the deferral of any of the spending proposals contemplated by the June 14, 2013 Proposal to Creditors.	Conway MacKenzie Ernst & Young
623	Expense Reduction	Deferral of Spending	DWSD Discovery Parties	DR0085	85. All Documents analyzing the deferral of any of the spending proposals contemplated by the City's June 14, 2013 Proposal to Creditors.	Conway MacKenzie Ernst & Young
624	Expense Reduction	Labor Costs	Ambac	DR0051	All documents that reflect any research or analysis conducted by or for the City related to efforts to reduce its labor costs from January 1, 2009 to present, whether implemented, considered, or proposed.	Conway MacKenzie Ernst & Young
625	Expense Reduction	Labor Costs	DWSD Discovery Parties	DR0083	83. All Documents reflecting research or analysis related to any the City's efforts to reduce its labor costs from January 1, 2009 to the present, whether implemented, considered or proposed.	Conway MacKenzie Ernst & Young
626	Expense Reduction	Labor Costs	EEPK FMS WT FGIC	DR0139	139. All Documents and Communications concerning any research and/or analysis prepared by or for the City related to efforts to reduce the City's labor costs from January 1, 2009 to the present, whether implemented, considered, or proposed.	Conway MacKenzie Ernst & Young
627	Expense Reduction	Operational Efficiency	EEPK FMS WT FGIC	DR0138	138. All Documents and Communications concerning the City's efforts to improve operational efficiency and realize cost savings from improvements in operational efficiency.	Conway MacKenzie Ernst & Young
628	Expense Reduction	Outsourcing	Retiree Committee	DR0014	All contracts for outsourcing of City services and operations, cost of outsourcing and analysis of cost savings	Conway MacKenzie Ernst & Young
629	Expense Reduction		Ambac	DR0048	All documents and communications that relate to expense reduction efforts undertaken since the Petition Date or planned by the City for the future.	Conway MacKenzie (Kevin Hand) Ernst & Young
630	Expense Reduction		Ambac	DR0098-C	C. The statement on page 44 that "The City estimates that it has been able to realize more than \$200 million in annual savings [as a result of CETs];"	Conway MacKenzie Ernst & Young
631	Expense Reduction		DWSD Discovery Parties	DR0086	86. All Documents that relate to expense reduction efforts undertaken since the Petition Date or planned by the City for the future.	Conway MacKenzie Ernst & Young
632	Expense Reduction		Retiree Committee	DR0041	All documents explaining, discussing, describing, showing or analyzing all expense reduction efforts undertaken by the City from the Pre-Petition Period to the present.	Conway MacKenzie Ernst & Young
633	Expenses - Paycheck Cost		Ambac	DR0098-H	H. The statements on page 51 that the cost to the City to process payroll is \$62 per check, more than 4 times the "general average of \$15 per paycheck, and almost 3.5 times the average of \$18 per paycheck for other public sector organizations."	Publicly Available (Declaration of Kevyn Orr)
634	Expenses - Professional Fees	Documents Evidencing Work Performed	Sole	DR0012	12. Any and all documents establishing the work performed by consultants or any other individuals who received professional fees as identified in the attached Mulhata report for the years 2013-2014 (see Exhibit 1), including hours spent on the work and payment per hour for work performed.	Any documents establishing or reflecting a custodian/witness' work product would be contained in that custodian/witness' documents.
635	Expenses - Professional Fees	Monthly Cash Flow Forecast	Sole	DR0010	10. A copy of all contracts with professional consultants or any other individuals who received professional fees as identified in the attached Mulhata report for the years 2013-2014. (See Exhibit 1)	Any contracts authorizing a custodian/witness' work would be contained in that custodian/witness' documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
636	Expenses - Professional Fees	Reports Issued	Sole	DR0011	11. A copy of all reports issued by professional consultants or any other individuals who received professional fees as identified in the attached Mulhatra report for the years 2013-2014. (See Exhibit 1)	Any documents establishing or reflecting a custodian/witness' work product would be contained in that custodian/witness' documents.
637	General	Documents identified in response to Interrogatories	Deutsche Bank	DR0001	REQUEST FOR PRODUCTION NO. 1: Deutsche Bank requests that the City produce each document identified in response to the foregoing Interrogatories.	Not Applicable
638	General	Documents Produced to Other Parties	DPSU	DR0004	4. The Public Safety Unions hereby join in and adopt as if fully set forth herein the Official Committee of Retirees' First Set of Requests to the Debtor for the Production of Documents [Docket No. 3941] and request that the City produce to the Public Safety Unions copies of the documents requested therein.	Not Applicable
639	General	Documents Produced to Other Parties	Macomb County	DR0066	REQUEST NO. 66: All documents produced by or to any party in this Bankruptcy Proceeding, including but not limited to any documents responsive to any other party's document requests served in this Bankruptcy Proceeding, which are herein incorporated by reference.	Not Applicable
640	General	Documents Produced to Other Parties	Retirement Systems	DR0047	Produce all responses to interrogatories, requests for admissions, and requests for production to other creditors or parties in interest, whether formally or informally, related to the Disclosure Statement or the Plan.	Not Applicable
641	General	Documents Produced to Others	Ambac	DR0102	All documents produced to other creditors or parties in interest, whether formally or informally, for purposes related to the Disclosure Statement or Plan.	Not Applicable
642	General	Documents Produced to Others	DWSD Discovery Parties	DR0002	All Documents produced and interrogatory responses served by the City to any parties in interest, pursuant to any written discovery requests served pursuant to the Scheduling Order.	Not Applicable
643	General	Documents Produced to Others	EEPK FMS WT FGIC	DR0002	2. All Documents that the City has produced (or in the future produces) to any creditor or party in interest other than EEPK, FMS, Wilmington Trust, and FGIC in response to a discovery request propounded in connection with the Plan by such other creditor or party in interest, including: a. Official Committee of Retiree's First Set of Requests to the Debtor for the Production of Documents dated April 10, 2014 [D.I. 3941]; b. Water and Sewer Trustee and Ad Hoc Bondholder Committee's Second Request for Production of Documents to Debtor dated April 8, 2014 [D.I. 3916]; c. Water and Sewer Trustee and Ad Hoc Bondholder Committee's First Request for Production of Documents to Debtor dated April 3, 2014 [D.I. 3766]; d. Syncora Capital Assurance Inc. and Syncora Guarantee Inc.'s First Request for the Production of Documents to the City of Detroit dated March 28, 2014 [D.I. 3314]; and e. Ambac Assurance Corporation's First Request for Documents to the Debtor dated March 10, 2014 [D.I. 3052].	Not Applicable
644	General	Documents Regarding Testimony Topics	Retiree Association	DR0006	6. All memoranda or communications prepared by an employee, agent, officer, or representative of Debtor or the Emergency Manager regarding any of the Testimony Topics.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
645	General	Documents Relied Upon	Ambac	DR0001	All documents that You have reviewed, identified, or relied upon in answering Ambac's First Set of Interrogatories to Debtor.	Not Applicable

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
646	General	Documents Relied Upon	Carlton Carter	DR0001	Please identify and produce each document that you identified, located, discovered the existence of, observed, reviewed, or examined relating to your response to Creditors' interrogatories No. 1 through 21 above.	Not Applicable
647	General	Documents Relied Upon	Dexia	DR0049	49. All documents that You have reviewed, identified, or relied upon in answering Dexia's First Set of Interrogatories to the City.	Not Applicable
648	General	Documents Relied Upon	DWSD Discovery Parties	DR0001	1. All Documents that You have reviewed, identified, or relied upon in answering any of the DWSD Discovery Parties' Interrogatories.	Not Applicable
649	General	Documents Relied Upon	EEPK FMS WT FGIC	DR0001	1. All Documents described, referenced, or relied upon by you in your responses to EEPK, FMS, Wilmington Trust, and FGIC's First Set of Interrogatories to the City.	Not Applicable
650	General	Documents Relied Upon	Macomb County	DR0054	REQUEST NO. 54: All documents reviewed, identified, or relied upon in answering any interrogatories sent by holders of bonds issued by the DWSD or municipal bond insurers insuring bonds issued by the DWSD.	Not Applicable
651	General	Documents Relied Upon	Retiree Association	DR0052	52. All documents identified in the City's answers to the Interrogatories served by the Retiree Association Parties.	Not Applicable
652	General	Documents Relied Upon	U.S. Bank	DR0056	Documents reviewed, identified, or relied upon in answering any interrogatories sent by holders of bonds issued by the DWSD or municipal bond insurers insuring bonds issued by the DWSD.	Not Applicable
653	General	Documents Relied Upon	UAW	DR0004	Any and all documents upon which you relied or to which you referred in answering the UAW's Interrogatories.	Not Applicable
654	General	Documents Relied Upon	UAW	DR0005	Any and all documents concerning your answers to the UAW's Interrogatories.	Not Applicable
655	General	Documents Relied Upon in Response to Requests for Admissions	Retirement Systems	DR0001	1. Produce all documents that are identified in, evidence, support, or relate to your responses to the Detroit Retirement Systems' Requests for Admissions Directed to the City of Detroit, Michigan.	Not Applicable
656	General	Documents Relied Upon in Interrogatories	Retirement Systems	DR0002	2. Produce all documents that are identified in, evidence, support, or relate to your responses to the Detroit Retirement Systems' Interrogatories Directed to the City of Detroit, Michigan.	Not Applicable
657	General	Exhibits at Trial	Ambac	DR0003	All documents that the City intends to or may use as exhibits or evidence or for any purpose at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
658	General	Exhibits at Trial	DWSD Discovery Parties	DR0057	57. All Documents that the City intends to or may use as exhibits or evidence or for any purpose at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
659	General	Exhibits at Trial	EEPK FMS WT FGIC	DR0003	3. All Documents that you intend to introduce into evidence at the confirmation hearing or at any other hearing related or ancillary to confirmation of the Plan.	Not Applicable
660	General	Exhibits at Trial	Macomb County	DR0061	REQUEST NO. 61: All documents that the City intends to or may use as exhibits or evidence or for any purpose at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan related to DWSD.	Not Applicable
661	General	Exhibits at Trial	Retiree Association	DR0005	5. With respect to the Witnesses and Orr, all documents Debtor plans to or may introduce into evidence or show the witness or Court during the course of their testimony.	Not Applicable

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
662	General	Exhibits at Trial	Retiree Committee	DR0054	All documents that the City will or may submit as evidence at the Confirmation Hearing, as such phrase term is defined in Section I.A.48 of the Amended Plan.	Not Applicable
663	General	Exhibits at Trial	Retirement Systems	DR0036	36. Produce all documents the City intends to use or may use as exhibits or evidence at the Confirmation Hearing or at any other hearing related to confirmation of the Plan.	Not Applicable
664	General	Exhibits at Trial	U.S. Bank	DR0049	All Documents that the City intends to or may use as exhibits or evidence or for any purpose at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
665	General	Exhibits to Plan	Ambac	DR0002	All documents and all drafts of documents referenced as exhibits to the Disclosure Statement or Plan or that are to be included in any Plan Supplement.	Publicly Available
666	General	Exhibits to Plan	Dexia	DR0050	50. All documents and all drafts of documents referenced as exhibits to the Disclosure Statement or Plan or that are to be included in any Plan Supplement.	Publicly Available
667	General	Exhibits to Plan	DPSU	DR0001	1. Produce a copy of Exhibit I.A.255 to the Amended Plan.	Publicly Available
668	General	Exhibits to Plan	DPSU	DR0003	3. Produce a copy of Exhibit II.B.3.t.ii.A to the Amended Plan.	Publicly Available
669	General	Exhibits to Plan	DWSD Discovery Parties	DR0060	60. All Documents, including drafts, referenced in the Disclosure Statement or Plan, including the following missing exhibits from the Disclosure Statement: Exhibit I.A.80; Exhibit I.A.127; Exhibit I.A.148.a; Exhibit I.A.172; Exhibit I.A.173; Exhibit I.A.175; Exhibit I.A.177; Exhibit I.A.180; Exhibit I.A.182; Exhibit I.A.202.a; Exhibit I.A.208; Exhibit I.A.210; Exhibit I.A.211; Exhibit I.A.255; Exhibit II.B.3.t.ii.A; Exhibit II.B.3.u.ii.A; Exhibit II.D.5; Exhibit II.D.6; and Exhibit III.D.2.	Publicly Available
670	General	Exhibits to Plan	EEPK FMS WT FGIC	DR0004	4. All Documents and all drafts of Documents referenced as exhibits to the Disclosure Statement or the Plan.	Publicly Available
671	General	Exhibits to Plan	Retirement Systems	DR0048a	48. Produce the following exhibits to the Plan, as well as all other documents or drafts of documents that are to be included in any Plan supplement: Exhibit I.A.80 Form of DIA Settlement Documents Exhibit I.A.127 Principal Terms of Exit Facility Exhibit I.A.148.a Form of GRS Hybrid Pension Plan Exhibit I.A.172 Form of New B Notes Documents Exhibit I.A.173 Form of New DWSD Bond Documents Exhibit I.A.175 Form of New Existing Rate DWSD Bond Documents Exhibit I.A.177 Form of New Existing Rate GLWA Bond Documents Exhibit I.A.180 Form of New GLWA Bond Documents Exhibit I.A.182 Form of New GLWA Revolving Bond Documents Exhibit I.A.202.a Form of PFRS Hybrid Pension Plan Exhibit I.A.208 Form of Plan COP Settlement Documents Exhibit I.A.210 Principal Terms of Plan UTGO Notes Exhibit I.A.211 Form of Plan UTGO Note Exhibit I.A.255 State Contribution Agreement	Publicly Available

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
672	General	Exhibits to Plan	Retirement Systems	DR0048b	48. Produce the following exhibits to the Plan, as well as all other documents or drafts of documents that are to be included in any Plan supplement: Exhibit II.B.3.t.ii.A Schedule of Payments and Sources of Payments for Modified PFRS Pension Benefits Exhibit II.B.3.u.ii.A Schedule of Payments and Sources of Payments for Modified GRS Pension Benefits Exhibit II.D.5 Schedule of Postpetition Collective Bargaining Agreements Exhibit II.D.6 Executory Contracts and Unexpired Leases to Be Rejected Exhibit III.D.2 Retained Causes of Action	Publicly Available
673	General	Exhibits to Plan	U.S. Bank	DR0044-A	The following exhibits (or current versions thereof) to the Plan: a) Form of New DWSD Bond Documents,	Publicly Available
674	General	Exhibits to Plan	U.S. Bank	DR0044-B	The following exhibits (or current versions thereof) to the Plan: b) Form of New Existing Rate DWSD Bond Documents,	Publicly Available
675	General	Exhibits to Plan	U.S. Bank	DR0044-C	The following exhibits (or current versions thereof) to the Plan: c) Form of New Existing Rate GLWA Bond Documents,	Publicly Available
676	General	Exhibits to Plan	U.S. Bank	DR0044-D	The following exhibits (or current versions thereof) to the Plan: d) Form of New GLWA Bond Documents,	Publicly Available
677	General	Exhibits to Plan	U.S. Bank	DR0044-E	The following exhibits (or current versions thereof) to the Plan: e) Form of New GLWA Revolving Bond Documents.	Publicly Available
678	General	Expert - Assumptions Provided	EEPK FMS WT FGIC	DR0009	9. All Documents concerning Communications between the City and any witness the City expects or intends to call to testify as an expert in connection with Plan confirmation concerning assumptions provided to any witness the City expects or intends to call to testify as an expert and upon which assumptions such witness relied in forming the opinions to be expressed.	Not Applicable
679	General	Expert - Communications	EEPK FMS WT FGIC	DR0013	13. All Documents concerning Communications between the City and any witness appointed by the Court pursuant to the Expert Order to testify as an expert in connection with Plan confirmation concerning assumptions provided to any such witness.	Not Applicable
680	General	Expert - Compensation	EEPK FMS WT FGIC	DR0007	7. All Documents concerning compensation to be paid to each witness the City expects or intends to call to testify as an expert in connection with Plan confirmation, including, without limitation, Documents evidencing Communication between the City and such witness concerning such compensation.	Not Applicable
681	General	Expert - Compensation	EEPK FMS WT FGIC	DR0011	11. All Documents concerning compensation to be paid to each witness appointed by the Court pursuant to the Expert Order to testify as an expert in connection with Plan confirmation, including, without limitation, Documents evidencing Communication between the City and such witness concerning such compensation.	Not Applicable
682	General	Expert - Documents Provided or Prepared	Ambac	DR0007	All documents, including reports, models, or data compilations, which have been provided to, reviewed by, or prepared by or for any expert witnesses for purposes related to the Disclosure Statement or the Plan.	Not Applicable
683	General	Expert - Documents Provided or Prepared	DWSD Discovery Parties	DR0059	59. All Documents, including reports, models, data compilations, retainer agreements, invoices and curriculum vitae, which have been provided to, reviewed by, or prepared by or for any expert witnesses for purposes related to the Plan.	Not Applicable

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
684	General	Expert - Documents Provided or Prepared	EEPK FMS WT FGIC	DR0008	8. All Documents concerning facts or data supplied by the City to any witness the City expects or intends to call to testify as an expert in connection with Plan confirmation and upon which the expert relied in forming the opinions to be expressed, including, without limitation, Documents evidencing Communication between the City and such witness concerning facts or data so supplied.	Not Applicable
685	General	Expert - Documents Provided or Prepared	EEPK FMS WT FGIC	DR0010	10. All Documents that have been provided to, reviewed by, or prepared by or for any expert witness the City expects or intends to call to testify in connection with confirmation of the Plan.	Not Applicable
686	General	Expert - Documents Provided or Prepared	EEPK FMS WT FGIC	DR0012	12. All Documents concerning facts or data supplied by the City to any witness appointed by the Court pursuant to the Expert Order to testify as an expert in connection with Plan confirmation.	Not Applicable
687	General	Expert - Documents Provided or Prepared	EEPK FMS WT FGIC	DR0014	14. All Documents that have been provided to, reviewed by, or prepared by or for any expert witness appointed by the Court pursuant to the Expert Order.	Not Applicable
688	General	Expert - Documents Provided or Prepared	Macomb County	DR0065	REQUEST NO. 65: All documents, including reports, models, or data compilations, which have been provided to, reviewed by, or prepared by or for any expert witnesses for purposes related to the treatment of DWSD in the Amended Disclosure Statement or the Plan.	Not Applicable
689	General	Expert - Documents Provided or Prepared	U.S. Bank	DR0053	All Documents, including reports, models, or data compilations, which have been provided to, reviewed by, or prepared by or for any expert witnesses for purposes related to the Disclosure Statement or the Plan.	Not Applicable
690	General	Expert - Documents Relied Upon	Syncora	DR0070	All documents, facts, information, and data that the City's expert witnesses consider or rely upon.	Not Applicable
691	General	Expert - Resumes or CVs	Ambac	DR0006	The most current resume or curriculum vitae for each person the City intends to call to testify as a potential expert witness at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
692	General	Expert Resume or CVs	EEPK FMS WT FGIC	DR0015	15. The current resume or curriculum vitae for each person the City expects or intends to call to testify as an expert in connection with Plan confirmation.	Not Applicable
693	General	Expert Resume or CVs	U.S. Bank	DR0051	The biography, education and work history, or curriculum vitae of any person the City intends to call as a fact witness at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
694	General	Expert Resume or CVs	U.S. Bank	DR0052	The most current resume or curriculum vitae for each person the City intends to call to testify as a potential expert witness at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
695	General	Expert Resumes or CVs	Macomb County	DR0064	REQUEST NO. 64: The most current resume or curriculum vitae for each person the City intends to call to testify as a potential expert witness with respect to the treatment of DWSD at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Amended Disclosure Statement.	Not Applicable
696	General	Experts - Documents Provided or Prepared	Retirement Systems	DR0039	39. Produce all documents, including reports, models, or data compilations, which have been provided to, reviewed by, or prepared by or for any expert witnesses for purposes related to the Disclosure Statement or the Plan.	Not Applicable
697	General	Experts - Documents Relied Upon	Retiree Committee	DR0056	All reports for any expert that the City will or may call at the Confirmation Hearing, and all documents used or relied upon by those experts.	Not Applicable
698	General	Interrogatories Served to Other Parties	Macomb County	DR0067	REQUEST NO. 67: All interrogatory responses served by or to any party in this in this Bankruptcy Proceeding.	Not Applicable
699	General	Plan Supplement Documents	EEPK FMS WT FGIC	DR0005	5. All Documents and all drafts of Documents that are to be included in any Plan Supplement.	The Plan Supplement will be publicly available.
700	General	Responses to Interrogatories from Other Parties	Ambac	DR0014 2d	14. All responses to interrogatories propounded to and/or served on the City by any other party.	Not Applicable
701	General	Resume or CVs - Fact or Expert Witness	Retirement Systems	DR0038	38. Produce the biography, education and work history, or curriculum vitae of any person the City intends to call as a fact or expert witness at the Confirmation Hearing or at any other hearing related to confirmation of the Plan.	Not Applicable
702	General	Witness - Communications	EEPK FMS WT FGIC	DR0017	17. All Documents concerning Communications between the City and any fact witness that may testify on behalf of the City at the Plan confirmation hearing.	Any documents concerning communications with a custodian/witness would be contained in that custodian/witness' documents.
703	General	Witness - Communications	Retiree Association	DR0002	2. With respect to the Witnesses, all communications with any, some, or all witnesses regarding their respective Testimony Topics.	Any documents concerning communications with a custodian/witness would be contained in that custodian/witness' documents.
704	General	Witness - Documents Prepared or Provided	Macomb County	DR0062	REQUEST NO. 62: All documents that the City has provided or intends to provide to any witness it intends to call to testify with respect to the treatment of DWSD at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Amended Disclosure Statement.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.
705	General	Witness - Documents Provided or Prepared	Ambac	DR0004	All documents that the City has provided or intends to provide to any witness that it intends to call to testify at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.
706	General	Witness - Documents Provided or Prepared	DWSD Discovery Parties	DR0058	58. All Documents that the City has provided or intends to provide to or has received from any witness that it may call to testify at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
707	General	Witness - Documents Provided or Prepared	Retiree Association	DR0001	1. With respect to the Witnesses and Orr, all documents, including communications, authored or prepared by any, some, or all of them regarding their respective Testimony Topics.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.
708	General	Witness - Documents Provided or Prepared	Retiree Association	DR0003	3. With respect to the Witnesses, all documents provided to any, some, or all of them regarding their respective Testimony Topics.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.
709	General	Witness - Documents Provided or Prepared	Retiree Association	DR0004	4. With respect to the Witnesses and Orr, all documents reviewed by, shown to, or provided to them in preparation for their testimony.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.
710	General	Witness - Documents Provided or Prepared	Retirement Systems	DR0037	37. Produce all documents the City has provided or intends to provide to any witness that it intends to call at the Confirmation Hearing or at any other hearing related to confirmation of the Plan.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.
711	General	Witness - Documents Provided or Prepared	U.S. Bank	DR0050	All Documents that the City has provided or intends to provide to any witness that it intends to call to testify at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.
712	General	Witness - Resumes or CVs	Ambac	DR0005	The biography, education and work history, or curriculum vitae of any person the City intends to call as a fact witness at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
713	General	Witness - Resumes or CVs	Dexia	DR0051	51. The biography, education and work history, or curriculum vitae of any person the City intends to call as a fact witness at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation, hearings concerning the approval of the Disclosure Statement in connection with the allowance and proposed treatment of Pension Claims and OPEB Claims.	Not Applicable
714	General	Witness - Resumes or CVs	Macomb County	DR0063	REQUEST NO. 63: The biography, education and work history, or curriculum vitae of any person the City intend s to call as a fact witness with respect to the treatment of DWSD at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Amended Disclosure Statement.	Not Applicable
715	General	Witnsss - Resume or CVs	EEPK FMS WT FGIC	DR0016	16. The current resume or curriculum vitae for each person the City expects or intends to call as a fact witness in connection with Plan confirmation.	Not Applicable
716	General	Documents Relied Upon in Answering Interrogatoires	Oakland	DR0051	51. Documents reviewed, identified, or relied upon in answering any interrogatories herein.	Not Applicable
717	General	Exhibits at Trial	Oakland	DR0042	42. All Documents that the City intends to or may use as exhibits or evidence or for any purpose at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
718	General	Exhibits to Plan	DPSU	DR0002	2. Produce a copy of Exhibits I.A.79 and I.A.80 to the Amended Plan.	Publicly Available

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
719	General	Exhibits to Plan	Oakland	DR0037	37. The following exhibits (or current versions thereof) to the Plan: a) Form of New DWSD Bond Documents, b) Form of New Existing Rate DWSD Bond Documents, c) Form of New Existing Rate GLWA Bond Documents, d) Form of New GLWA Bond Documents, and e) Form of New GLWA Revolving Bond Documents.	Publicly Available
720	General	Expert - Documents Provided or Prepared	Oakland	DR0046	46. All Documents, including reports, models, or data compilations, which have been provided to, reviewed by, or prepared by or for any expert witnesses for purposes related to the Disclosure Statement or the Plan.	Not Applicable
721	General	Expert - Resumes or CV	Oakland	DR0045	45. The most current resume or curriculum vitae for each person the City intends to call to testify as a potential expert witness at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
722	General	Witness - Documents Provided or Prepared	Oakland	DR0043	43. All Documents that the City has provided or intends to provide to any witness that it intends to call to testify at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Any documents provided to a custodian/witness would be contained in that custodian/witness' documents.
723	General	Witness - Resumes or CV	Oakland	DR0044	44. The biography, education and work history, or curriculum vitae of any person the City intends to call as a fact witness at the Confirmation Hearing or at any other hearing related or ancillary to confirmation of the Plan, including without limitation hearings related to the approval of the Disclosure Statement.	Not Applicable
724	General	Witness - Resume or CV	Retiree Committee	DR0055	All CVs and resumes of all witnesses the City will or may call at the Confirmation Hearing. 56. All reports for any expert that the City will or may call at the Confirmation Hearing, and all documents used or relied upon by those experts.	Not Applicable
725	General	Expert - Documents Provided or Prepared	Dexia	DR0052	52. All documents, including reports, models, or data compilations, which have been provided to, reviewed by, or prepared by or for any expert witnesses for purposes related to the Disclosure Statement or the Plan in connection with the allowance and proposed treatment of Pension Claims and OPEB Claims.	Not Applicable
726	Grant Applications	CSBG Grants	Sole	DR0021	21. Any and all documents pertaining to the receipt of federal CSBG grant funds from the State of Michigan by the City of Detroit and the distribution of those funds for the years 2011-2014.	Sonya Mays Conway MacKenzie
727	Grant Applications	Funds Available from State or Federal Government	Retiree Association	DR0017	17. All memoranda or communications prepared since the filing of the City's bankruptcy petition by an employee, agent, officer, or representative of the Debtor, the City or the Emergency Manager, or sent or given to any of the them, regarding funds that might be available to the City or any of its creditors from the State of Michigan, any Michigan State agency, the federal government or a federal agency.	Joseph Tiller Sonya Mays Conway MacKenzie
728	Grant Applications	Funds Available from State or Federal Government	Retiree Association	DR0018	18. All assessments or analyses of potential funds that might be available for the City or any of its creditors from the State of Michigan, any Michigan State agency, the federal government or a federal agency	Sonya Mays Conway MacKenzie

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
729	Grant Applications	Helping Hardest Hit Homeowner Funds - Michigan State Housing Development Authority	Sole	DR0019	19. Any and all documents, emails, correspondence, etc., with the Michigan State Housing Development Authority concerning the distribution and procurement of Helping Hardest Hit Homeowner funds by the City of Detroit either for its own behalf or on behalf of City residents.	Kevyn Orr Sonya Mays Stacy Fox Conway MacKenzie
730	Grant Applications	Helping Hardest Hit Homeowner Funds - United States Department of Treasury	Sole	DR0020	20. Any and all documents, emails, correspondence, etc., with the United States Department of Treasury concerning the distribution and procurement of Helping Hardest Hit Homeowner funds by the City of Detroit either for its own behalf or on behalf of City residents.	Kevyn Orr Sonya Mays Stacy Fox Conway MacKenzie
731	Grant Applications		Ambac	DR0011 2d	11. All documents and communications that relate to the City's past or planned future efforts to generate or maximize existing grants from state or federal government.	Sonya Mays Conway MacKenzie Nakia Johnson Chris Gannon Emily McLain Petrovski Vernice Anthony Alicia Minter Glen Kushiner Heather Green Eric Higgs
732	Grant Applications		Ambac	DR0057	All documents and communications that relate to any pending or in-progress grant applications that exceed \$5 million in the aggregate under a single program.	Sonya Mays Conway MacKenzie Nakia Johnson Chris Gannon Emily McLain Petrovski Vernice Anthony Alicia Minter Glen Kushiner Heather Green Eric Higgs
733	Grant Applications		Retiree Committee	DR0024	All documents setting forth, discussing or analyzing: (a) any third party funding (other than debt funding) in excess of \$5 million in the aggregate under a single program or from a single source actually or potentially available to the City, including but not limited to state, federal or private grants, aid or contributions, (b) all such funding that has been applied for or received by the City, and (c) all such funding that the City plans to apply for in the future.	Sonya Mays Conway MacKenzie
734	Grant Applications		Syncora	DR0066	All documents and communications relating to any federal, state, or private money that the City of Detroit either (a) has received since January 1, 2010 or (b) expects to receive.	Sonya Mays Conway MacKenzie (Chris Gannon) Council Reports 2011, 2012, 2013
735	Grant Applications		Retiree Association	DR0028	28. All communications with the Mayor's Office regarding: (a) any third party funding (other than debt funding) in excess of \$5 million in the aggregate under a single program or from a single source actually or potentially available to the City, including but not limited to state, federal or private grants, aid or contributions, (b) all such funding that has been applied for or received by the City, and (c) all such funding that the City plans to apply for in the future.	Sonya Mays Conway MacKenzie Mike Duggan

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
736	Liabilities	Installment Notes and Loans	Ambac	DR0081	All documents that reflect or explain the City's obligations described in Section III(B)(2)(c) of the Disclosure Statement. [This request relates to the outstanding installment notes and loans, related to the Section 108 HUD Loan Guarantee Program and Downtown Development Authority (DDA).]	Donita Crumpler Joseph Tiller
737	Liabilities	Installment Notes and Loans	Ambac	DR0082	All documents that reflect any research or analysis conducted by or for the City related to the City's obligations described in Section III(B)(2)(c) of the Disclosure Statement, including analyses of the origin and validity of the debt. [This request relates to the outstanding installment notes and loans, related to the Section 108 HUD Loan Guarantee Program and Downtown Development Authority (DDA).]	Donita Crumpler Joseph Tiller
738	Liabilities	Interfund	Ambac	DR0073	All documents that reflect interfund loans, balances or deferrals, including documents and communications that reflect the transfers that gave rise to the loans or deferrals, the conditions or terms of the loans or deferrals, the dates of the loans or deferrals, the purposes of the loans or deferrals, any methods or policies governing or applying to the City's repayment of the loaned or deferred funds to their original fund.	Ernst & Young John Hill John Naglick Rick Drumb
739	Liabilities	Interfund	Ambac	DR0074	All documents that reflect the proposed treatment of interfund loans or deferrals under the Plan, including any research or analysis conducted by or for the City related to such treatment.	Ernst & Young John Hill John Naglick Rick Drumb
740	Liabilities	Interfund	Ambac	DR0075	All documents that reflect any research or analysis conducted by or for the City related to the legality of interfund loans or deferrals.	Ernst & Young John Hill John Naglick Rick Drumb
741	Liabilities	Interfund	Ambac	DR0076	All documents that reflect any research or analysis conducted by or for the City related to the potential cancelation or invalidation of interfund loans or deferrals.	Ernst & Young John Hill John Naglick Rick Drumb
742	Liabilities	Interfund	Macomb County	DR0027	REQUEST NO. 27: All documents that reflect or relate to the amount of the interfund balances with DWSD water and sewer fund, including but not limited to all documents that reflect or relate to the process that the City used to determine whether, how, and in what amounts transfers will be made between these funds and any methods or policies governing or applying to the City's prepayment of transferred funds to their original fund, and how these interfund balances will be treated in the Plan.	Ernst & Young John Hill John Naglick Rick Drumb
743	Liabilities	Interfund	Retiree Committee	DR0058	All documents explaining, discussing, describing, showing or analyzing the "interfund payables" referenced in section VII.B.7 of the Amended Disclosure Statement, including (i) all loans, balances and deferrals, (ii) the interfund transfers, (iii) the conditions, terms, dates and purposes of the loans or deferrals, and (iv) any methods or policies governing or applying to the City's repayment of the loaned or deferred funds to their original fund.	Ernst & Young John Hill John Naglick Rick Drumb

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
744	Liabilities	Interfund Loans	DWSD Discovery Parties	DR0082	82. All Documents relating to interfund loans, balances or deferrals, including all Documents that reflect: (i) the transfers that gave rise to the loans or deferrals; (ii) the conditions or terms of the loans or deferrals; (iii) the dates of the loans or deferrals; (iv) the purposes of the loans or deferrals; (v) any methods or policies governing or applying to the City's repayment of the loaned or deferred funds to their original fund; (vi) the proposed treatment of the loans or deferrals under the Plan; and (vii) any research or analysis regarding the treatment of the loans or deferrals, their legality or their potential cancellation or invalidation.	Ernst & Young John Hill John Naglick Rick Drumb
745	Mayor	City owned automotive insurance company	Retiree Association	DR0040	40. All documents and communications describing or concerning the Mayor's plan to organize a City-owned automotive insurance plan or company.	Charles Raimi Mike Duggan
746	Mayor	Communications with Counties	Retiree Association	DR0031	31. All communications between the Mayor's Office, the Mayor or anyone working with or for the Mayor and any representative of Macomb, Oakland, or Wayne Counties regarding the DWSD.	Mike Duggan
747	Mayor	Communications with DIA	Retiree Association	DR0034	34. All communications between the Mayor's Office, the Mayor or anyone working with or for the Mayor and the DIA, the members of the DIA board, members of the DIA's administration, and DIA employees, concerning the Plan, the DIA Settlement or the DIA's or Foundations' contributions to the Plan.	Mike Duggan
748	Mayor	Communications with Policy Think Tanks	Retiree Association	DR0032	32. All communications between the Mayor's Office, the Mayor or anyone working with or for the Mayor and any policy institute, research institute, or think tank concerning the Bankruptcy case.	Mike Duggan
749	Mayor	Communications with US politicians	Retiree Association	DR0030	30. All communications between the Mayor's Office, the Mayor or anyone working with or for the Mayor and any Member of the United States Congress, the United States President, or their offices, assistants, representatives or agents.	Mike Duggan
750	Mayor	DIA Settlement or Grand Bargain	Retiree Association	DR0033	33. All communications between the Mayor's Office, the Mayor or anyone working with or for the Mayor and the Foundations concerning the Plan, the DIA Settlement or their contributions to the Plan.	Mike Duggan
751	Mayor	Job Creation Plans	Retiree Association	DR0038	38. All documents and communications describing or concerning the Mayor's job creation plans.	Charles Raimi Mike Duggan Thomas Lewand
752	Mayor	Peaks Initiative	Retiree Association	DR0039	39. All documents and communications describing or concerning the Mayor's parks initiative.	Charles Raimi Mike Duggan
753	Mayor	Suits Against Landlords of Blighted Buildings	Retiree Association	DR0041	41. All documents and communications describing or concerning the Mayor's plan to sue landlords of blighted buildings, and/or pursue delinquent taxes from them.	Charles Raimi Mike Duggan
754	Mayor and City Council	Implementation of Plan	EEPK FMS WT FGIC	DR0168	168. All Documents and Communications concerning and related to whether the City's mayor and/or the City Council will be required to implement the Plan and the City's budget, including the Restructuring and Reinvestment Initiatives attached to the Disclosure Statement as Exhibit I.	Mike Duggan
755	Pension	DLC employees	UAW	DR0002	Any and all documents concerning correspondence between you and the GRS during or any time after December 2012 concerning either (1) pension benefits of active DLC employees or retired former DLC employees or (2) pension contributions made on behalf of active DLC employees or retired former DLC employees.	Milliman (expert discovery; production pending)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
756	Pensions	DLC employees	UAW	DR0001	Any and all documents concerning correspondence between you and the DLC during or any time after December 2012 concerning either (1) pension benefits of active DLC employees or retired former DLC employees or (2) pension contributions made on behalf of active DLC employees or retired former DLC employees.	Detroit Public Library
757	Pensions	DLC employees	UAW	DR0003	3. Any and all documents concerning correspondence between you and the State during or any time after December 2012 concerning either (1) pension benefits of active DLC employees or retired former DLC employees or (2) pension contributions made on behalf of active DLC employees or retired former DLC employees.	Milliman (expert discovery; production pending)
758	Plan	Bond Insurance	Macomb County	DR0052	REQUEST NO. 52: All documents relating to the procurement of municipal bond insurance for any new bonds to be issued under the Plan.	Department of Water
759	Plan	Bond Insurance	Oakland	DR0038	38. Documents relating to the procurement of municipal bond insurance for any new bonds to be issued under the Plan.	Department of Water
760	Plan	Bond Insurance	U.S. Bank	DR0045	Documents relating to the procurement of municipal bond insurance for any new bonds to be issued under the Plan.	Department of Water Conway MacKenzie Sanjay Marken
761	Plan	Bond Ratings	Macomb County	DR0053	All documents relating to the procurement of public ratings for any new bonds to be issued under the Plan.	Department of Water
762	Plan	Bond Ratings	Oakland	DR0039	39. Documents relating to the procurement of public ratings for any new bonds to be issued under the Plan.	Department of Water
763	Plan	Bond Ratings	U.S. Bank	DR0046	Documents relating to the procurement of public ratings for any new bonds to be issued under the Plan.	Department of Water
764	Plan	Exhibits	Retiree Committee	DR0028	All documents constituting, explaining or discussing unfiled Plan Exhibits referred to in the Table of Exhibits to the Amended Plan, including but not limited to: (a) Exhibit I.A.173 - Form of DWSD Bond Documents, (b) Exhibit I.A.175 - Form of New Existing Rate DWSD Bond Documents, (c) Exhibit I.A.177 - Form of New Existing Rate GLWA Bond Documents, (d) Exhibit I.A.180 - Form of New GLWA Bond Documents relating to Exhibits, (e) Exhibit II.B.3.u.ii.A. - Schedule of Payments and Sources of Payments for Modified GRS Pension Benefits, (f) Exhibit II.B.3.t.ii.A, (g) drafts of all such exhibits, and (h) all documents consulted or relied upon in the preparation of those exhibits.	Publicly Available
765	Plan	Interest Rate Reset	U.S. Bank	DR0043	Reports, whether generated internally or by outside consultants, regarding the appropriate interest rate and comparables utilized in creating the Interest Rate Reset Chart, attached as Exhibit I.A.159 to the City's proposed Plan.	Sanjay Marken
766	Plan	Interest Rate Teset	Oakland	DR0036	36. Reports, whether generated internally or by outside consultants, regarding the appropriate interest rate and comparables utilized in creating the Interest Rate Reset Chart, attached as Exhibit I.A.159 to the City's proposed Plan.	Sanjay Marken
767	Post Confirmation Financing/Exit Financing		Retiree Committee	DR0023	All documents constituting, setting forth or discussing any communications with any financial institution regarding the debt capacity of the City or any exit financing, DIP financing or any other post-petition financing arrangement, and all documents, including but not limited to terms sheets, provided to, or received from, any such institution in connection with any such communication.	Ken Buckfire Jim Doak Ernst & Young
768	Post-Confirmation Financing/Exit Financing	Post Confirmation Debt Analysis	DWSD Discovery Parties	DR0079	79. All Documents reflecting research or analysis related to the amount of Debt the City will have and will be able to support immediately following confirmation of the proposed Plan.	Ken Buckfire Jim Doak Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
769	Post-Confirmation Financing/Exit Financing	Revenue Hurdle	Ambac	DR0028	All documents that relate to the calculations or projections of the Revenue Hurdle. [see Disclosure Statement (p. 94)]	Not Applicable. This is no longer a part of the Plan.
770	Post-Confirmation Financing/Exit Financing		Ambac	DR0083	All documents that reflect any research or analysis conducted by or for the City related to the amount of debt the City will have, and will be able to support, immediately following confirmation of the proposed Plan.	Ernst & Young Ken Buckfire Jim Doak Sanjay Marken
771	Post-Confirmation Financing/Exit Financing		Ambac	DR0084	All documents that reflect any research or analysis conducted by or for the City related to the limits imposed by applicable law on the City's ability to incur debt, and whether the City is limited in its ability to incur additional debt as a result of such limits.	Ken Buckfire Jim Doak Sanjay Marken
772	Post-Confirmation Financing/Exit Financing		Ambac	DR0085	All documents that reflect any research or analysis conducted by or for the City related to the City's anticipated costs with respect to any post-petition financing.	Ken Buckfire Jim Doak Ernst & Young
773	Post-Confirmation Financing/Exit Financing		Ambac	DR0086	All documents that reflect any research or analysis conducted by or for the City related the City's anticipated costs with respect to any exit financing.	Ken Buckfire Jim Doak
774	Post-Confirmation Financing/Exit Financing		Ambac	DR0087	All documents that reflect any research or analysis conducted by or for the City related to the City's anticipated costs with respect to any post-confirmation financing.	Ken Buckfire Jim Doak
775	Post-Confirmation Financing/Exit Financing		Ambac	DR0088	All documents that reflect any research or analysis conducted by or for the City related the City's need for exit financing.	Ken Buckfire Jim Doak
776	Post-Confirmation Financing/Exit Financing		Ambac	DR0089	All documents and communications that relate to any attempts by the City to obtain the Exit Facility, including documents and communications reflecting any requests for proposals (RFPs) sent to financial institutions and other indication of interest by potential lenders, proposed security packages, the terms of the proposals received in response to the RFPs, comparisons of the proposals, and negotiations with financial institutions.	Ken Buckfire Jim Doak
777	Post-Confirmation Financing/Exit Financing		Ambac	DR0090	All documents and communications that relate to the process by which City has selected or intends to select the Exit Facility Agent and any other financial institution party to the Exit Facility.	Ken Buckfire Jim Doak
778	Post-Confirmation Financing/Exit Financing		Ambac	DR0091	All documents and communications that relate to other potential exit financing lenders, including communications regarding potential exit financing since the Petition Date.	Ken Buckfire Jim Doak
779	Post-Confirmation Financing/Exit Financing		Ambac	DR0092	All documents and communications that relate to the Exit Facility contemplated by the Plan, including the actual, potential, or expected terms, costs, security for, and interest rate on the Exit Facility.	Ken Buckfire Jim Doak
780	Post-Confirmation Financing/Exit Financing		Ambac	DR0093	All documents and communications that relate to the purpose or intended uses of the Exit Facility funds.	Ken Buckfire Jim Doak

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
781	Post-Confirmation Financing/Exit Financing		Ambac	DR0094	All documents that reflect any research or analysis conducted by or for the City related to the potential effects of the confirmation of the Plan or the impairment thereunder of general obligation bond claims on the City's borrowing costs with respect to the Exit Facility or any post-confirmation financing.	Ken Buckfire Jim Doak
782	Post-Confirmation Financing/Exit Financing		DWSD Discovery Parties	DR0077	77. All Documents relating to any exit facility or post-confirmation financing, including all Documents relating to: (i) actual, potential or expected terms, cost, security for, and interest rate on the exit facility; (ii) the purpose or intended use of the exit facility funds; (iii) the selection process for the exit facility agent; (iv) Communications with potential exit financing lenders; (v) requests for proposals sent to financial institutions or other potential lenders; and (vi) any research or analysis related to the City's need for exit financing.	Ken Buckfire Jim Doak
783	Post-Confirmation Financing/Exit Financing		DWSD Discovery Parties	DR0078	78. All Documents relating to any financing that is not disclosed in the Plan or Disclosure Statement, including all Documents relating to (i) actual, potential or expected terms, cost, security for, and interest rate on the financing; (ii) the purpose or intended use of the funds; (iii) the selection process for obtaining the financing; (iv) Communications with potential financing lenders; (v) requests for proposals sent to financial institutions or other potential lenders; and (vi) any research or analysis related to the City's need for the financing.	Ken Buckfire Jim Doak
784	Post-Confirmation Financing/Exit Financing		EEPK FMS WT FGIC	DR0164	164. All Documents and Communications concerning the terms of the Exit Facility, including, without limitation, (a) the status of the City's efforts to obtain an Exit Facility, (b) the principal amount of financing sought, (c) the interest rate the City has requested, (d) the assets that the City proposes to have serve as collateral for the Exit Facility, (e) the maturity date, and (f) the intended use of the proceeds of the Exit Facility.	Ken Buckfire Jim Doak
785	Post-Confirmation Financing/Exit Financing		EEPK FMS WT FGIC	DR0165	165. All Documents and Communications concerning any attempts by the City to obtain the Exit Facility, including, without limitations, (a) all documents and communications reflecting any requests for proposals ("RFPs") sent to financial institutions and other indications of interest by potential lenders, (b) proposed security packages, (c) the terms of the proposals received in response to the RFPs, (d) comparisons of the proposals, and (e) negotiations with financial institutions.	Ken Buckfire Jim Doak
786	Post-Confirmation Financing/Exit Financing		Retirement Systems	DR0045	45. Produce all documents and communications relating to the Exit Facility, including the identity of the Exit Facility Agent, the terms of the Exit Facility, the interest rate, the loan documentation, amount of the Exit Facility, expected costs, proposed collateral and any documents relating to feasibility of the Plan if Exit Facility is obtained.	Ken Buckfire Jim Doak
787	Post-Confirmation Financing/Exit Financing		Retirement Systems	DR0046	46. Produce all documents relating to the purpose or intended use of the Exit Facility funds.	Ken Buckfire Jim Doak
788	Projections	Cash Flows	Retirement Systems	DR0027	27. Provide the City's projected cash flows through 2054, including yearby- year projections and distributions.	Ernst & Young
789	Projections	City Management After Chapter 9	EEPK FMS WT FGIC	DR0166	166. All Documents and Communications concerning any restrictions or limitations on, or oversight of, the management and operations of the City after its emergence from Chapter 9.	Sonya Mays

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
790	Projections	Exhibit H	Syncora	DR0071-A	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: a. In Microsoft Excel format, comparable data for every fiscal year from 1980 through 2007;	Ernst & Young
791	Projections	Exhibit H	Syncora	DR0071-B	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: b. Documents sufficient to show the related tax rates, as applicable, from 1980 to 2013;	Ernst & Young
792	Projections	Exhibit H	Syncora	DR0071-C	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: c. Documents sufficient to show forecasted tax rates, as applicable, through 2017, and all assumptions and computations upon which those	Ernst & Young
793	Projections	Exhibit H	Syncora	DR0071-D	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: d. Documents sufficient to show all changes in any tax provision or computational element that influenced revenue (e.g., assessed property values) from 1980 through 2013	Ernst & Young
794	Projections	Exhibit H	Syncora	DR0071-E	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: e. Documents sufficient to show all forecasted changes in any tax provision or computational element that would influence revenue through 2017, and the effective date of each such change;	Ernst & Young
795	Projections	Exhibit H	Syncora	DR0071-F	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: f. Documents sufficient to show the forecasted revenue impact of any forecasted changes in any tax provision or computational element, broken down by each year through 2017, and all assumptions and computations upon which those forecasted revenue impacts were based;	Ernst & Young
796	Projections	Exhibit H	Syncora	DR0071-G	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: g. Documents sufficient to identify any variables that were assumed when determining revenue, and, for each such variable, documents sufficient to identify (a) their historical and forecasted values from 1980 to 2017 and (b) the sources of those historical and forecasted values;	Ernst & Young
797	Projections	Exhibit H	Syncora	DR0071-H	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: h. All documents relating to the methodology by which the revenues were calculated or forecast;	Ernst & Young
798	Projections	Exhibit H	Syncora	DR0071-I	For every revenue line item in Exhibit H to the Disclosure Statement, provide the following documents or data: i. If an econometric, regression, or other statistical model was used to derive any forecasts from 1980 to the present, documents sufficient to show (i) the related regression or other equations; (ii) definitions of each explanatory and dependent variable in those equations; (iii) the historical values of those variables over the time periods studied; (iv) the sources of those historical values; (v) the forecasted values of those variables; (vi) the sources of those forecast values; and (vii) all output describing the performance of the equations or models in question.	Ernst & Young
799	Projections	Exhibit J	Retiree Committee	DR0018-A	With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (a) all drafts of the projections	Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
800	Projections	Exhibit J	Retiree Committee	DR0018-B	With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (b) the City's projections or estimates for population, assessed property values, or any other demographics underlying the revenue projections,	Ernst & Young
801	Projections	Exhibit J	Retiree Committee	DR0018-C	With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (c) the City's projections or estimates for expenditures, including assumptions for work force, salaries, benefits, materials and supplies, utilities, purchased services, and other operating expenses	Ernst & Young
802	Projections	Exhibit J	Retiree Committee	DR0018-D	With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (d) the formulation or derivation of the "Contingency" line items	Ernst & Young
803	Projections	Exhibit J	Retiree Committee	DR0018-E	With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (e) any cash balance in the City's General Fund in the projections, (e) the City's projections or estimates for revenues	Ernst & Young
804	Projections	Exhibit J	Retiree Committee	DR0018-F	With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (f) projections for revenues attributable to department revenue initiatives pertaining to "Reinvestment in the City,"	Ernst & Young
805	Projections	Exhibit J	Retiree Committee	DR0018-G	18. With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (g) the City's projections or estimates for capital expenditures or capital investments pertaining to "Reinvestment in the City,"	Ernst & Young
806	Projections	Exhibit J	Retiree Committee	DR0018-H	18. With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (h) the City's projections or estimates for additional operating expenditures (apart from expenditures relating to capital expenditures or investments and blight) pertaining to "Reinvestment in the City,"	Ernst & Young
807	Projections	Exhibit J	Retiree Committee	DR0018-I	With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (i) the City's projections or estimates for capital expenditures or capital investments, other than such expenditures as pertain to "Reinvestment in the City,"	Ernst & Young
808	Projections	Exhibit J	Retiree Committee	DR0018-J	With respect to the ten-year financial projections included in Exhibit J to the Amended Disclosure Statement, produce all documents constituting, setting forth, discussing, or underlying: (j) documents and work papers prepared or used in connection with Exhibit J to the Amended Disclosure Statement and all drafts of such projections.	Ernst & Young
809	Projections	Exhibit J	Syncora	DR0044	All prior drafts of the City's 10-year projections, attached as Exhibit J to the City's Disclosure Statement [Doc. No. 2709].	Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
810	Projections	Exhibit J	Syncora	DR0045	Documents sufficient to show all of the assumptions in the City's 10-year projections, attached as Exhibit J to the City's Disclosure Statement [Doc. No. 2709], and the basis for each of these assumptions.	Ernst & Young
811	Projections	Exhibits I and J	EEPK FMS WT FGIC	DR0101	101. All Documents and Communications concerning the development and formulation of the City's Projections attached as Exhibits I and J to the Disclosure Statement, including, without limitation, the assumptions underlying the Projections, and the anticipated or potential impact on the Projections with respect to any changes made to these assumptions.	Ernst & Young
812	Projections	Expense Reductions	Ambac	DR0003 2d	3. All documents and communications that relate to the projected impact of cost and expense reductions contemplated by the City on its financial projections, including any projections attached to any Disclosure Statement with respect to the Plan.	Ernst & Young
813	Projections	Forty Year Projections [What Exhibit?]	EEPK FMS WT FGIC	DR0132	132. The Plan of Adjustment – 40 year projections, dated 03/30/2014 (the "40 Year Projections").	Ernst & Young
814	Projections	Forty Year Projections [What Exhibit?]	EEPK FMS WT FGIC	DR0133	133. All Documents and Communications concerning the 40-Year Projections, including without limitation all prior and subsequent drafts thereof, and all documents and communications concerning the assumptions made by the City in formulating the 40 Year Projections, including with respect to appropriate discount rates for calculating projected recoveries under the Plan.	Ernst & Young
815	Projections	General Funds	EEPK FMS WT FGIC	DR0110	110. All Documents and Communications concerning the calculations and/or assumptions made by the City with respect to the "General Funds" included in the most recent Ten-Year summary of Restructuring Initiatives, including, without limitation, all Documents and Communications supporting any assumptions included in the Ten-Year summary as to Enterprise Fund payments for POC Debt service, and Grant Revenue.	Ernst & Young
816	Projections	Growth Assumptions	EEPK FMS WT FGIC	DR0115	115. All Documents and Communications that support or refute the City's growth assumptions from 2015 through 2023.	Ernst & Young
817	Projections	Growth Rates	DWSD Discovery Parties	DR0091	91. All Documents that reflect the calculations or determinations of growth rates relevant to the income tax revenue projections included in the most recent Ten-Year summary of Restructuring Initiatives, including all Documents supporting any assumptions included in the Ten-Year summary as to: (i) the City's population growth; (ii) employment in the City and its allocation between residents and non-residents; and (iii) average wage assumptions.	Ernst & Young
818	Projections	Income Tax - Average Wages	Ambac	DR0041-C	All documents that reflect the calculations or determinations of growth rates relevant to the income tax revenue projections included in the most recent Ten-Year summary of Restructuring Initiatives, including all documents supporting any assumptions included in the Ten-Year summary as to: C. Average wage assumptions.	Ernst & Young
819	Projections	Income Tax - Employment	Ambac	DR0041-B	All documents that reflect the calculations or determinations of growth rates relevant to the income tax revenue projections included in the most recent Ten-Year summary of Restructuring Initiatives, including all documents supporting any assumptions included in the Ten-Year summary as to: B. Employment in the City and its allocation between residents and non-residents; and	Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
820	Projections	Income Tax - Population	Ambac	DR0041-A	All documents that reflect the calculations or determinations of growth rates relevant to the income tax revenue projections included in the most recent Ten-Year summary of Restructuring Initiatives, including all documents supporting any assumptions included in the Ten-Year summary as to: A. The City's population growth	Ernst & Young
821	Projections	Income Tax Growth Rates	EEPK FMS WT FGIC	DR0105	105. All Documents and Communications concerning the calculations and/or determinations of growth rates relevant to the income tax revenue projections included in the most recent Ten-Year summary of Restructuring Initiatives, including, without limitation, all documents and communications supporting any assumptions included in the Ten-Year summary as to: (a) the City's population growth; (b) employment in the City and its allocation between residents and non-residents; and (c) average wage assumptions.	Ernst & Young
822	Projections	Income Taxes	Syncora	DR0038	All documents created between January 1, 2013 and the present containing calculations or analysis regarding the City's future income tax revenues, including, but not limited to, the assumptions underlying any such calculations or analysis (i.e., population growth in the City, employment and property ownership in the City, and income rates in the City).	Ernst & Young
823	Projections	Job Growth	Retiree Association	DR0027	27. All documents setting forth, discussing and/or mentioning the City's expected, predicted or projected growth in available jobs at any time in the next 20 years.	Conway MacKenzie
824	Projections	Labor	Retiree Association	DR0036	36. All documents describing, and communications concerning, the future personnel hiring goals of the City.	Conway MacKenzie
825	Projections	Population	EEPK FMS WT FGIC	DR0113	113. All Documents and Communications that support or refute the City's projection that the population will continue to decline through 2020.	Conway MacKenzie
826	Projections	Population	Retiree Association	DR0026	26. All documents setting forth, discussing and/or mentioning the City's expected, predicted or projected population growth at any time in the next 30 years.	Conway MacKenzie
827	Projections	Property Tax Revenue	Ambac	DR0039	All documents that reflect the calculations of the ad valorem tax revenue projections included in the most recent Ten-Year summary of Restructuring Initiatives.	Ernst & Young
828	Projections	Property Tax Revenue	EEPK FMS WT FGIC	DR0106	106. All Documents and Communications concerning the calculations and/or determinations of growth rates relevant to the property tax revenue projections included in the most recent Ten-Year summary of Restructuring Initiatives, including, without limitation, all documents and communications supporting any assumptions included in the Ten-Year summary with respect to property tax revenues.	Ernst & Young
829	Projections	Revenue Forecast	Syncora	DR0080-A	All revenue forecasts prepared by the City, Ernst & Young, or any other City consultant or advisor from January 1, 2009 to the present and the following information for each forecast: a. All documents and communications relating to each revenue forecast;	Ernst & Young
830	Projections	Revenue Forecast	Syncora	DR0080-B	All revenue forecasts prepared by the City, Ernst & Young, or any other City consultant or advisor from January 1, 2009 to the present and the following information for each forecast: b. Documents sufficient to show the issue date of each forecast;	Ernst & Young
831	Projections	Revenue Forecast	Syncora	DR0080-C	All revenue forecasts prepared by the City, Ernst & Young, or any other City consultant or advisor from January 1, 2009 to the present and the following information for each forecast: c. Documents sufficient to show the author or authors of each forecast;	Ernst & Young

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832	Projections	Revenue Forecast	Syncora	DR0080-D	All revenue forecasts prepared by the City, Ernst & Young, or any other City consultant or advisor from January 1, 2009 to the present and the following information for each forecast: d. Documents sufficient to show the purpose for each forecast.	Ernst & Young
833	Projections	State Revenue Sharing	EEPK FMS WT FGIC	DR0109	109. All Documents and Communications concerning the calculations and/or determinations of growth rates relevant to the state revenue sharing projections included in the most recent Ten-Year summary of Restructuring Initiatives, including, without limitation, all documents and communications supporting any assumptions included in the Ten-Year summary with respect to state revenue sharing.	Ernst & Young
834	Projections	Wagering Tax Revenues	EEPK FMS WT FGIC	DR0108	108. All Documents and Communications concerning the calculations and/or determinations of growth rates relevant to the wagering tax revenue projections included in the most recent Ten-Year summary of Restructuring Initiatives, including, without limitation, all documents and communications supporting any assumptions included in the Ten-Year summary with respect to wagering tax revenues.	Ernst & Young
835	Projections	Wagering Tax Revenues	EEPK FMS WT FGIC	DR0116	116. All Documents and Communications that support or refute the City's growth assumptions with respect to the casinos and wagering revenues.	Ernst & Young
836	Projections		Ambac	DR0007 2d	7. All documents and communications that relate to the City's financial projections, including projected revenues, expenses, costs, cash flows, and the like for the year 2023 and beyond.	Ernst & Young Conway MacKenzie
837	Projections		Ambac	DR0024	All documents and communications that relate to the development and formulation of the City's Projections attached to the Disclosure Statement as Exhibits I and J, including without limitation the assumptions underlying the Projections, including those discussed on pages 121-123 of the Disclosure Statement, and the anticipated or potential impact on the Projections of any changes to these assumptions.	Kevin Hand Ernst & Young
838	Public Lighting Authority	Legal Authority to Privatize	Sole	DR0016	16. Any and all documents that establish the authority of the Emergency Manager to privatize or sell the Detroit Public Lighting Department.	Conway MacKenzie
839	Public Lighting Authority		EEPK FMS WT FGIC	DR0137	137. All Documents and Communications concerning the status of the transition of the operation and maintenance of the City's public lighting system to the PLA or PLA's efforts to construct and improve the public street lighting system, including, without limitation, the City's current estimate of the number of street lights that currently are not functioning.	Conway MacKenzie
840	Reinvestment Initiatives/Revitalization	Adequate Services	Retiree Association	DR0008	8. All memoranda or communications prepared by an employee, agent, officer, or representative of Debtor or the Emergency Manager regarding the City's historical, current, and future ability to provide adequate levels of municipal services, including but not limited to police and fire services.	Conway MacKenzie Ernst & Young
841	Reinvestment Initiatives/Revitalization	Blight Removal	EEPK FMS WT FGIC	DR0093	93. All Documents and Communications from January 1, 2013, concerning the City's efforts and/or strategy for removing blight.	Conway MacKenzie Ernst & Young Sonya Mays
842	Reinvestment Initiatives/Revitalization	Blight Removal	EEPK FMS WT FGIC	DR0094	94. The budget for the Blight Initiative.	Conway MacKenzie Ernst & Young
843	Reinvestment Initiatives/Revitalization	Blight Removal	EEPK FMS WT FGIC	DR0095	95. All Documents and Communications concerning potential funding sources for the Blight Initiative.	Conway MacKenzie Sonya Mays

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844	Reinvestment Initiatives/Revitalization	Blight Removal	EEPK FMS WT FGIC	DR0096	96. All Documents and Communications analyzing the potential impact, if any, of the Blight Initiative upon the City and its revitalization efforts.	Conway MacKenzie Ernst & Young
845	Reinvestment Initiatives/Revitalization	Blight Removal	EEPK FMS WT FGIC	DR0097	97. All Documents and Communications analyzing alternatives to the Blight Initiative.	Conway MacKenzie
846	Reinvestment Initiatives/Revitalization	Blight Removal	EEPK FMS WT FGIC	DR0107	107. All Documents and Communications concerning all research and/or analysis conducted by or for the City related to the impact of future development and/or tax revenue due to the Blight Initiative.	Conway MacKenzie Ernst & Young
847	Reinvestment Initiatives/Revitalization	Blight Removal	Retiree Association	DR0037	37. All surveys of blighted and abandoned structures, and all plans to remove blight, including but not limited to, any survey in which Dan Gilbert participated in the preparation.	Conway MacKenzie
848	Reinvestment Initiatives/Revitalization	Blight Removal	Retiree Association	DR0042	42. All documents and communications describing or concerning any plans, proposals or offers by any entities to remove blight in the City.	Conway MacKenzie
849	Reinvestment Initiatives/Revitalization	Blight Removal	Sole	DR0002	2. Any and all documents, reports, emails, etc., identifying which Detroit homes are being identified as blighted and subject to demolition.	Conway MacKenzie
850	Reinvestment Initiatives/Revitalization	Blight Removal	Sole	DR0003	3. Any and all documents, reports, emails, etc., identifying which Detroit homes identified in Requests for Production of Documents 1 or 2 are bank-owned or Fannie Mae or Freddie Mac owned.	Conway MacKenzie
851	Reinvestment Initiatives/Revitalization	Blight Removal	Sole	DR0004	4. Any and all documents, reports emails, etc., identifying which Detroit homes identified in Requests for Production of Documents 1 or 2 are occupied, including those which are occupied by "squatters."	Conway MacKenzie
852	Reinvestment Initiatives/Revitalization	Blight Task Force	Sole	DR0001	1. Any and all reports of the Detroit Blight Task Force.	Conway MacKenzie
853	Reinvestment Initiatives/Revitalization	Consultant Reports	Retiree Committee	DR0013	All consultant reports regarding City operations, remediation, restoration and redevelopment.	Conway MacKenzie
854	Reinvestment Initiatives/Revitalization	Department of Neighborhoods, Department of Public Lighting, Detroit Land Bank	Retiree Association	DR0035	35. All documents describing the expected scope of work of the Department of Neighborhoods, the Department of Public Lighting, and the Detroit Land Bank.	Conway MacKenzie
855	Reinvestment Initiatives/Revitalization	Exhibit J	Retiree Committee	DR0019	All documents and work papers prepared or used in connection with the ten-year sum of restructuring initiatives and associated projections included in Exhibit I to the Amended Disclosure Statement, including all drafts of such summary and projections, and all documents discussing analyzing or underlying such summary and projections, and all consultant reports prepared in connection with any restructuring initiative	Conway MacKenzie Ernst & Young
856	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0095-A	All documents that reflect any research or analysis conducted by or for the City related to the anticipated effects of the Reinvestment Initiatives, including but not limited to analyses of whether and how the Reinvestment Initiatives will affect: A. The City's revenue;	Conway MacKenzie Ernst & Young
857	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0095-B	All documents that reflect any research or analysis conducted by or for the City related to the anticipated effects of the Reinvestment Initiatives, including but not limited to analyses of whether and how the Reinvestment Initiatives will affect: B. The City's expenses;	Conway MacKenzie Ernst & Young

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858	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0095-C	All documents that reflect any research or analysis conducted by or for the City related to the anticipated effects of the Reinvestment Initiatives, including but not limited to analyses of whether and how the Reinvestment Initiatives will affect: C. The value of real estate located in the City;	Conway MacKenzie Ernst & Young
859	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0095-D	All documents that reflect any research or analysis conducted by or for the City related to the anticipated effects of the Reinvestment Initiatives, including but not limited to analyses of whether and how the Reinvestment Initiatives will affect: D. The City's population.	Conway MacKenzie Ernst & Young
860	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0096-A	All documents and communications, including written reports, business plans, and financial schedules, the relate to any Reinvestment Initiatives, including without limitation: A. Blight removal;	Conway MacKenzie Ernst & Young
861	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0096-B	All documents and communications, including written reports, business plans, and financial schedules, the relate to any Reinvestment Initiatives, including without limitation: B. Restructuring of the City's parking and arena system;	Carl Sekely (Conway MacKenzie) Ernst & Young
862	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0096-C	All documents and communications, including written reports, business plans, and financial schedules, the relate to any Reinvestment Initiatives, including without limitation: C. The City's Police;	Conway MacKenzie Ernst & Young
863	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0096-D	All documents and communications, including written reports, business plans, and financial schedules, the relate to any Reinvestment Initiatives, including without limitation: D. The City's Fire/EMS;	Conway MacKenzie Ernst & Young
864	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0096-E	All documents and communications, including written reports, business plans, and financial schedules, the relate to any Reinvestment Initiatives, including without limitation: E. The City's Department of Transportation; and	Conway MacKenzie Ernst & Young Glen Kushiner
865	Reinvestment Initiatives/Revitalization	Financial Effects	Ambac	DR0096-F	All documents and communications, including written reports, business plans, and financial schedules, the relate to any Reinvestment Initiatives, including without limitation: F. Any other City departments or agencies.	Conway MacKenzie Ernst & Young
866	Reinvestment Initiatives/Revitalization	Fire Department	Retiree Association	DR0015	15. All reports, memoranda and/or other documents created in 2012 or thereafter concerning the need, or lack thereof, for additional fire fighters, fire fighting vehicles or fire fighting resources generally.	Conway MacKenzie
867	Reinvestment Initiatives/Revitalization	Implementation	EEPK FMS WT FGIC	DR0111	111. All Documents and Communications concerning the likelihood of implementation of the Restructuring Initiatives in the Ten-Year Plan.	Conway MacKenzie
868	Reinvestment Initiatives/Revitalization	Need for Additional Police Resources	Retiree Association	DR0009	9. All reports, memoranda and/or other documents created in 2012 or thereafter concerning the need, or lack thereof, for additional police officers, police vehicles, modernized police vehicles, or police resources generally.	Conway MacKenzie
869	Reinvestment Initiatives/Revitalization	Parking	EEPK FMS WT FGIC	DR0098	98. All Documents and Communications concerning all reports, including drafts, being prepared by any parking specialist on behalf of the City, as referenced on page 71, section VII.A.3.b.(iii) in the Disclosure Statement.	Carl Sekely (Conway MacKenzie)
870	Reinvestment Initiatives/Revitalization	Parking	EEPK FMS WT FGIC	DR0099	99. All Documents and Communications concerning the City's efforts to enter into a transaction or series of transactions to monetize the City-owned parking facilities.	Carl Sekely (Conway MacKenzie)
871	Reinvestment Initiatives/Revitalization	Parking Violations Bureau	Sole	DR0027	27. Any and all documents establishing expenditures by and revenues received by the Parking Violations Bureau.	Conway MacKenzie

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872	Reinvestment Initiatives/Revitalization	Police	Retiree Association	DR0012a-c	12. Any and all reports prepared since January 1, 2013 related to evaluations and/or recommendations of the DPD's vehicle fleet. This includes any such reports and recommendations prepared by DPD members, any city consultants, including The Bratton Group, LLC, and Conway MacKenzie. This request specifically includes but is not limited to: a. The DPD's Vehicle Fleet Replacement Policy which was to be completed by the captain of Resource Management according to the DPD's Plan of Action; b. The DPD's report documenting its comprehensive fleet analysis to determine how many police vehicles are needed, which was scheduled to be completed by the captain of Resource Management according to the DPD's Plan of Action; c. Any reports prepared by the DPD, or its consultants, that provides a cost analysis for replacement of DPD vehicles.	Conway MacKenzie Kevin Hand Donna Iafrate
873	Reinvestment Initiatives/Revitalization	Police	Retiree Association	DR0012d-e	12. Any and all reports prepared since January 1, 2013 related to evaluations and/or recommendations of the DPD's vehicle fleet. This includes any such reports and recommendations prepared by DPD members, any city consultants, including The Bratton Group, LLC, and Conway MacKenzie. This request specifically includes but is not limited to: d. Any reports prepared by the DPD, or its consultants, that provides a basis for the city to propose a funding level of \$129.3 million to initiate and maintain a fleet vehicle replacement program on a three-year cycle in its Amended Plan; e. Any reports that provide the basis for the following statement from Page 60 in the DPD's Plan of Action: "The DPD will begin to purchase and replace one-third of its fleet on an annual basis. Funds are available and have been identified within the Emergency Manager's restructuring dollars allocated to DPD."	Conway MacKenzie Kevin Hand Donna Iafrate
874	Reinvestment Initiatives/Revitalization	Police - Chief Craig Communications re Plan of Action	Retiree Association	DR0011	11. All communications with, or communications by, Chief of Police James Craig concerning the January 9, 2014 Plan of Action.	Conway MacKenzie
875	Reinvestment Initiatives/Revitalization	Police - Evaluations	Retiree Association	DR0014	14. Any and all reports prepared since January 1, 2013 related to evaluations and/or recommendations of the DPD's personnel. This includes any such reports and recommendations prepared by DPD members, any city consultants, including The Bratton Group, LLC, and Conway MacKenzie and specifically includes but is not limited to: a. police officer deployment; b. reorganization of the DPD entities; c. command officer staffing; d. civilianization; e. timekeeping personnel; f. Any reports prepared by the DPD or its consultants that determined how many additional civilian the DPD should hire.	Conway MacKenzie Kevin Hand Donna Iafrate

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876	Reinvestment Initiatives/Revitalization	Police - Response	Retiree Association	DR0013a-d	13. Any and all reports prepared since January 1, 2013 related to evaluations and/or recommendations of DPD response times. This includes any such reports and recommendations prepared by DPD members, any city consultants, including The Bratton Group, LLC, and Conway MacKenzie. Any reports and/or recommendations that include the following information are to be produced in response to this request: a. All law enforcement "best practices" that were reviewed by the DPD to determine that a change was needed of its policy relative to response times; b. Categories of priorities that are used by the DPD; c. Response times goals for the DPD, e.g., the number of minutes desired for each category; d. Comparison of DPD response times and related policies with other agencies;	Conway MacKenzie Kevin Hand Donna Iafrate
877	Reinvestment Initiatives/Revitalization	Police - Response	Retiree Association	DR0013e-g	13. Any and all reports prepared since January 1, 2013 related to evaluations and/or recommendations of DPD response times. This includes any such reports and recommendations prepared by DPD members, any city consultants, including The Bratton Group, LLC, and Conway MacKenzie. Any reports and/or recommendations that include the following information are to be produced in response to this request: e. DPD policy and/or Standard Operating Procedure regarding police response times prior to Chief Craig being appointed as the chief of police and any modified policies/SOPS regarding response times that were changed since Chief Craig has served as the chief of police; f. The method that the DPD utilized to calculate police response times in 2013 prior to Chief James Craig being appointed to the position of chief of police; g. The method that the DPD utilizes to calculate police response times since Chief James Craig was appointed to the position of chief of police in July 2013.	Conway MacKenzie Kevin Hand Donna Iafrate
878	Reinvestment Initiatives/Revitalization	Police Dept Plan of Action (1/9/2014)	Retiree Association	DR0010	10. All documents, reports, memorandum and data underlying the Detroit Police Department January 9, 2014 Plan of Action and/or relied upon in preparation of the Plan of Action.	Conway MacKenzie Kevin Hand Donna Iafrate
879	Reinvestment Initiatives/Revitalization	Restructuring Plans	Ambac	DR0050	All documents that reflect any research or analysis conducted by or for the City related to any operational restructuring plans, whether implemented, considered, or proposed, including the costs of implementing such plans and the actual and projected resulting savings.	Conway MacKenzie
880	Reinvestment Initiatives/Revitalization	Restructuring Plans	Syncora	DR0042	All documents relating to the City's \$1.5 billion reinvestment initiative, including, but not limited to, the specific initiatives that make up the \$1.5 billion reinvestment initiative, the steps the City has taken to implement any of its restructuring and revitalization initiatives, the steps that the City intends to take to implement its restructuring and revitalization efforts, all financial projections and assumptions related to the reinvestment initiatives, and the City's analyses regarding the revenue generated by the reinvestment initiatives.	Conway MacKenzie
881	Reinvestment Initiatives/Revitalization	Ten Year Plan	EEPK FMS WT FGIC	DR0112	112. All Documents and Communications concerning the development of the Ten-Year Plan.	Ernst & Young

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882	Reinvestment Initiatives/Revitalization		Retiree Committee	DR0020	All documents setting forth, discussing or analyzing: (a) the reinvestment initiatives referred to in Section IX of the Amended Disclosure Statement, (b) the plan for implementation for each such initiative, and the estimated or projected costs of each such initiative, and (c) how each of the reinvestment initiatives referred to in Section IX of the Amended Disclosure Statement will generate additional revenues or result in additional savings for the City, and the projected or estimated timetable for the realization of any such additional revenues or savings.	Conway MacKenzie Ernst & Young
883	Reinvestment Initiatives/Revitalization		Retiree Committee	DR0042	All documents explaining, discussing, describing, showing or analyzing the formulation, consideration and/or implementation of operational restructuring plans, including the costs of implementing such plans and the actual and projected resulting savings.	Conway MacKenzie
884	Reinvestment Initiatives/Revitalization		Syncora	DR0043	43. All documents and communications relating to any partnerships between the City and private organizations regarding the City's proposed restructuring and revitalization efforts.	Conway MacKenzie
885	Reinvestment Initiatives/Revitalization		Syncora	DR0061	Documents sufficient to show all of the operational improvements that the City intends to implement.	Conway MacKenzie
886	Reinvestment Initiatives/Revitalization	Restructuring	DWSD Discovery Parties	DR0084	84. All Documents that reflect any research or analysis conducted by or for the City related to any operational restructuring plans, whether implemented, considered, or proposed, including the costs of implementing such plans and the actual and projected resulting savings.	Conway MacKenzie
887	Revenue	Declines	Ambac	DR0098-A	All documents and communications that tend to support or refute the following statements contained in the Disclosure Statement: A. The charts and accompanying text on pages 39-42 purporting to show declines in revenue, income taxes, state shared revenue, and employment;	Conway MacKenzie Ernst & Young
888	Services	Lighting	Ambac	DR0098-F	F. The statement on page 47 that "The total of functioning streetlights per square mile in the City generally was less than half that of comparable national municipalities;"	Conway MacKenzie
889	Services	Outsourcing Contracts	Retirement Systems	DR0025	25. Produce all contracts for outsourcing or privatizing City services and operations, cost of outsourcing and analysis of cost savings.	Conway MacKenzie
890	Services	Police/Crime	Ambac	DR0098-D	D. The data and crime statistics on page 45 relating to crime and police response times;	Publicly Available
891	Services	Police/Crime	Ambac	DR0098-E	E. The charts on pages 46-47 purporting to show "Comparables Data;"	Publicly Available
892	Services	Transportation	Ambac	DR0098-G	G. The statements on page 50 that bus fares are lower than comparable bus transit systems by approximately 30% on average, that bus transfers are offered at significantly reduced rates, and that DDOT's maintenance operations are "highly inefficient (58% less efficient) as compared with similar bus transit systems;"	Conway MacKenzie (Kushiner)
893	Settlement	Communications with Creditors	EEPK FMS WT FGIC	DR0169	169. All Documents and Communications concerning the City's negotiations with creditors over the terms of the Plan.	Any documents and communications with a custodian/witness would be contained in that custodian/witness' documents.
894	Settlement	Plan COP Settlement Documents	EEPK FMS WT FGIC	DR0120	120. All Documents and Communications constituting the Plan COP Settlement Documents.	Other than what is publicly available, the City is not aware of any responsive, non-privileged documents.
895	Settlement	Plan COP Settlement Documents	EEPK FMS WT FGIC	DR0121	121. All Documents and Communications concerning the Plan COP Settlement Documents.	Other than what is publicly available, the City is not aware of any responsive, non-privileged documents.
896	Settlement	Terms	EEPK FMS WT FGIC	DR0170	170. All Documents and Communications concerning compromises the City reached with creditors over the terms of the Plan.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
897	Settlements		Ambac	DR0058	All documents tending to support or refute that each settlement described in the Disclosure Statement and Plan will inure to the benefit of the City's creditors and residents, including without limitation analyses and projections of potential recoveries by or against the City, and the City's estimate of its legal fees, in the absence of such settlements.	Conway MacKenzie Ernst & Young
898	Settlements		Ambac	DR0063	All documents that relate to the terms of settlements, other than those described in the Disclosure Statement, that the City intends to enter into prior to the confirmation of the Plan or as a part of the Plan, including without limitation analyses and projections of potential recovery by or against the City, and the City's estimated legal fees, in the absence of such settlements.	Conway MacKenzie Ernst & Young
899	Settlements		DWSD Discovery Parties	DR0067	67. All Documents that relate to any settlements referenced in the Disclosure Statement or Plan.	Conway MacKenzie Ernst & Young Ken Buckfire Kyle Herman Jim Doak Sanjay Marken Kevyn Orr Sonya Mays
900	Settlements		DWSD Discovery Parties	DR0068	68. All Documents that relate to any settlement, other than those referenced in the Disclosure Statement or Plan, that the City may enter prior to the confirmation of the Plan or as part of the Plan, including any analyses and projections of potential recovery by or against the City, and the City's estimated legal fees, in the absence of such settlements.	Conway MacKenzie Ernst & Young Ken Buckfire Kyle Herman Jim Doak Sanjay Marken Kevyn Orr Sonya Mays
901	Settlements		Retiree Committee	DR0057	All documents constituting, discussing, or explaining each settlement described in the Amended Disclosure Statement and/or Amended Plan and how such settlement will benefit of the City's creditors and residents, including without limitation analyses and projections of potential recoveries by or against the City, and the City's estimate of its legal fees, in the absence of such settlements.	Conway MacKenzie Ernst & Young Ken Buckfire Kyle Herman Jim Doak Sanjay Marken Kevyn Orr Sonya Mays
902	Settlements		Retirement Systems	DR0044	44. Produce all documents that relate to the terms of settlements, other than those described in the Disclosure Statement, that the City intends to enter into prior to the confirmation of the Plan or as part of the Plan, including without limitation analyses and projections of potential recovery by or against the City and the City's estimated legal fees, in the absence of such settlements.	Conway MacKenzie Ernst & Young Ken Buckfire Kyle Herman Jim Doak Sanjay Marken Kevyn Orr Sonya Mays

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
903	State	Communications	EEPK FMS WT FGIC	DR0006	6. All Documents evidencing Communications from January 1, 2013, to present, by, between, or among the City and any elected official of the State of Michigan or any representative or staff of any elected official of the State of Michigan, concerning any of the following: (a) the Disclosure Statement, the Plan, or the Plan Supplement, (b) the Collection or the DIA Settlement, (c) the City Owned Real Property or Blight Initiative, (d) the DWSD or any transaction related thereto, (e) improving the collection of Accounts Receivable, (f) the City Owned Parking Facilities, (g) the Pension Claims, the OPEB Claims, or the State Contribution Agreement, (h) the Plan COP Settlement, (i) the potential or estimated recoveries of each Class of Unsecured Claims; (j) operational improvements made or that could be made by the City, or (k) the Exit Facility.	Breadth of request likely returned responsive documents from the files of custodians too numerous to list.
904	State	Funding	Retiree Association	DR0029	29. All communications with the Mayor's Office, the Mayor or anyone working with or for the Mayor regarding State reductions in funding for the City.	Mike Duggan
905	State	Funding	Syncora	DR0065	All documents relating to funding received by the City from the State of Michigan for any purpose from the time period January 1, 2005 to the present.	Conway MacKenzie Sonya Mays Ernst & Young
906	State	Money to GRS/PFRS	Ambac	DR0061	All documents that reflect any summaries or analyses conducted by or for the City that relate to the impact on the feasibility of the Plan and creditor recoveries under the Plan in the event the full amounts of the State GRS Consideration and/or the State PFRS Consideration are not received.	Ernst & Young
907	State	Revenue	Ambac	DR0012 2d	12. All documents and communications that relate to the City's past or planned future efforts to maximize the amount of state aid available to the City.	Conway MacKenzie Sonya Mays Ernst & Young
908	State	Revenue Sharing	Ambac	DR0046	All documents that reflect any research or analysis conducted by or for the City related to projected or anticipated State revenue-sharing.	Ernst & Young Shavi Sarna Daniel Jerneycic Michael Jamison Rick Drumb
909	State	Revenue Sharing	Retiree Committee	DR0040	All documents explaining, discussing, describing, showing or analyzing State Revenue Sharing including projected revenues and all communications between the City and State regarding State Revenue Sharing.	Ernst & Young Shavi Sarna Daniel Jerneycic Michael Jamison Rick Drumb
910	State	Revenue Sharing	Retirement Systems	DR0033	33. Produce all documents that reflect any research or analysis conducted by or for the City related to projected or anticipated State revenue-sharing during the term of the Plan.	Ernst & Young Shavi Sarna Daniel Jerneycic Michael Jamison Rick Drumb
911	State	Revenue Sharing	Sole	DR0015	15. Any and all correspondence between the City of Detroit and State of Michigan regarding the payment of revenue sharing from the State to the City from 2005 to the present.	Ernst & Young Shavi Sarna Daniel Jerneycic Michael Jamison Rick Drumb

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
912	State	Revenue Sharing	Syncora	DR0063	All documents created between January 1, 2005 and the present relating to the City's revenue-sharing arrangements with the State of Michigan.	Ernst & Young Shavi Sarna Daniel Jerneycic Michael Jamison Rick Drumb
913	State	Revenue Sharing	Syncora	DR0064	All communications between the City and the State of Michigan regarding State-funding, -taxation, or -revenue-sharing for the time period January 1, 2005 to the present.	Ernst & Young Shavi Sarna Daniel Jerneycic Michael Jamison Rick Drumb
914	State	Revenue Sharing	Syncora	DR0078	Documents sufficient to show the City's methodology for determining the forecasted revenue from state revenue sharing for the years 2013 to 2017.	Ernst & Young Shavi Sarna Daniel Jerneycic Michael Jamison Rick Drumb
915	State	Revenue Sharing	Syncora	DR0079	All documents and communications relating to and supporting the City's forecasted revenue from state revenue sharing.	Ernst & Young Shavi Sarna Daniel Jerneycic Michael Jamison Rick Drumb
916	Swaps	Swaps	Ambac	DR0056	Documents sufficient to establish the total amount of payments received by the Swap Counterparties pursuant to the Swap Contracts.	Ernst & Young Benjamin Rosenblum Wayne Flick Daniel Jerneycic
917	Swaps	Termination Feed in 2010-2013	Sole	DR0013	13. A copy of all documents leading to the payment of termination fees to swap counterparties for the years 2010-2012 in connection with interest rate swaps with the Detroit Water and Sewerage Department, including documents that establish the basis for the payment of the termination fees and the amount paid.	Not Applicable
918	Swaps		Retiree Committee	DR0063	All documents that refer to, discuss or analyze: (a) any agreement by the City to allow a claim by the Swap Counterparties as part of the Amended Plan, or the reasons for such decision or agreement, and/or treat the Swap Counterparties as a separate Class as part of the Amended Plan, or the reasons for such decision or agreement, (b) the amount of the Allowed Claim proposed for the Swap Counterparties under the Amended Plan, or the calculation of or rationale for such amount, and (c) the consideration to the Swap Counterparties for their agreement to vote in favor of the Amended Plan.	Conway MacKenzie Ernst & Young Ken Buckfire Kyle Herman Jim Doak Sanjay Marken Kevyn Orr Sonya Mays
919	Taxes	Past Due Debts and Taxes	Retiree Committee	DR0062	Documents listing, describing or evidencing: (a) all property tax abatements provided by the City since January 1, 2013, (b) past due income taxes owed by residents of the City, (c) past due income owed to the City by non-residents who are employed in the City, (d) past due debts of over \$10 million owed to the City, and (e) past due debt owed to the City by the State of Michigan.	Leighton Duncan Kimberly Miller
920	Taxes	Payment in Lieu of Taxes	Ambac	DR0045	All documents that reflect any research or analysis conducted by or for the City related to opportunities (or lack of opportunities) for Payment in Lieu of Taxes (PILOT) programs from the State or non-profit organizations.	Tony Clay

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
921	Taxes	Plans to Disgorge Past Rebates	Ambac	DR0013 2d	13. All documents and communications that relate to the City's past or planned future efforts to claw back or disgorge past tax rebates.	Kimberly Miller
922	Taxes	Property Assessment Valuation	EEPK FMS WT FGIC	DR0117	117. All Documents and Communications constituting the Property Assessment Valuation as of December 31, 2013.	Leighton Duncan Kimberly Miller
923	Taxes	Real Property	Ambac	DR0040	Documents and communications relating to City's plans to levy millage on real property post-confirmation in excess of applicable statutory, constitutional, or chapter limits other than for the purposes of paying unlimited tax general obligations. Include in your production documents relating to levies that have been or may be imposed to satisfy any judgment against the City.	Not Applicable. The City does not plan to do this.
924	Taxes	Wayne County	EEPK FMS WT FGIC	DR0102	102. All Documents and Communications concerning the historical tax revenues and chargebacks from Wayne County from 2000 to present.	John Naglick Leighton Duncan Kimberly Miller
925	Taxes - Ad Valorem	Accounts Deposited Into	Ambac	DR0008 2d	8. Documents sufficient to identify all accounts into which ad valorem taxes collected by or for the City, including receipts from Wayne County, were deposited, and the daily balances of such accounts during the fiscal year 2014.	Leighton Duncan
926	Taxes - Ad Valorem	Allocations	Ambac	DR0036	All documents that reflect the allocations of ad valorem tax revenues for each year from 2009 to the present, and the City's process for allocating partial payments of ad valorem tax revenues, when only partial tax payments are received.	Leighton Duncan Conway MacKenzie John Hill John Naglick Ernst & Young
927	Taxes - Ad Valorem	Consultant Review of City Property Tax Collection System	Retiree Association	DR0024	24. The two consultant reviews of the City's property tax collections systems that are mentioned on page 138 of the Amended Disclosure Statement.	Kyle Herman Carl Sekely Glen Kushiner Daniel Jerneycic Deven Patel Wayne Flick
928	Taxes - Ad Valorem	Consultant Review of City Property Tax Collection System	Retiree Association	DR0025	25. Communications with the two consultants who prepared the consultant reviews mentioned on page 138 of the Amended Disclosure Statement.	Kyle Herman Carl Sekely Glen Kushiner Daniel Jerneycic Deven Patel Wayne Flick
929	Taxes - Ad Valorem	Corporations Receiving Property Tax Abatements	Sole	DR0008	8. A list of all corporations based in the city of Detroit that are receiving property tax abatements, and any and all documents regarding the tax abatements.	Leighton Duncan Charlie Ericson
930	Taxes - Ad Valorem	Corporations Receiving Property Tax Abatements	Sole	DR0009	9. Any and all reports, studies, emails, etc., establishing compliance of corporations identified in Request for Production 8 with the terms of the property tax abatements.	Leighton Duncan Charlie Ericson
931	Taxes - Ad Valorem	Current Property Tax Roll	Syncora	DR0077	For the City's property tax revenue, a current property tax roll in Microsoft Excel format indicating, on a parcel-by-parcel basis, (a) estimated market value; (b) taxable value; (c) total millage rate; and (d) total annual assessment.	Charlie Ericson Leighton Duncan Peter Bawol
932	Taxes - Ad Valorem	Daily Collections	Ambac	DR0009 2d	9. Documents sufficient to establish the daily collections of ad valorem taxes by or for the City, including receipts from Wayne County, for fiscal year 2014.	Leighton Duncan

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
933	Taxes - Ad Valorem	Delinquent Taxes	Syncora	DR0073	For the time period 1980 to the present, documents sufficient to show(a) the number of taxpayers who complied with their City property tax obligationsand (b) the number of taxpayers who did not comply with their City property tax obligations.	Leighton Duncan
934	Taxes - Ad Valorem	Delinquent Taxes - Collections	Ambac	DR0037	All documents that reflect the City's efforts, from 2009 to the present, to collect delinquent or underpaid ad valorem taxes.	Leighton Duncan
935	Taxes - Ad Valorem	Delinquent Taxes - Collections	Ambac	DR0038	All documents that reflect the City's planned future efforts to collect full payment for ad valorem taxes from taxpayers after receiving only partial payments.	Leighton Duncan Kyle Herman Daniel Jerneycic
936	Taxes - Ad Valorem	Efforts to Generate Revenue from Property Exempt from Taxes	Ambac	DR0010 2d	10. All documents that relate to the City's past or planned future efforts to generate revenue from property that is exempt from property taxes, including by withdrawing the tax exempt status or obtaining payments in lieu of taxes.	Leighton Duncan
937	Taxes - Ad Valorem	Historical Payment Delinquency Rates	Ambac	DR0032	All documents that reflect any summaries or analyses conducted by or for the City that relate to the collection, collection rates, and/or payment delinquency rates of ad valorem taxes levied by the City for each year from 2004 to the present.	Leighton Duncan
938	Taxes - Ad Valorem	Historical Payments and Uncollected	Syncora	DR0075	For the time period 1980 to the present, documents sufficient to show (a) the total payments due based on the City's property tax and (b) the total payments due but uncollected based on the City's property tax.	Leighton Duncan
939	Taxes - Ad Valorem	Market Value; Taxable Values; Taxable to Market Ratio	Syncora	DR0076	For the City's property tax revenue, documents sufficient to show (a) the current and forecasted aggregate taxable values; (b) the current and forecasted aggregate market value; and (c) the aggregate taxable-to-market ratios.	Leighton Duncan
940	Taxes - Ad Valorem	Projected Delinquency Rates	Ambac	DR0033	All documents that reflect any projections prepared by or for the City that relate to the collection, collection rates, and/or payment delinquency rates of ad valorem taxes to be levied by the City through December 31, 2034.	Pamela Scales
941	Taxes - Ad Valorem	Wayne County	Ambac	DR0035	All documents that reflect summaries, analyses, and reconciliations of Wayne County's attempts to collect and settle ad valorem tax collection deficiencies for each year from 2009 to the present.	Leighton Duncan
942	Taxes - Ad Valorem	Wayne County	Sole	DR0005	5. Any and all documents, reports, emails, etc., documenting how much the City of Detroit paid in property tax charge backs to Wayne County for the years 2010 to 2014.	Leighton Duncan
943	Taxes - Ad Valorem	Wayne County	Sole	DR0006	6. Any and all documents, reports, emails, etc., identifying which Detroit homes were the source for the charge backs paid by the City of Detroit.	Leighton Duncan
944	Taxes - Ad Valorem	Wayne County; Bank-owned Homes	Sole	DR0007	7. Any and all documents, reports, emails, etc., identifying which Detroit homes that were the source for the charge backs paid by the City of Detroit were bank-owned or owned by Fannie Mae or Freddie Mac.	Leighton Duncan
945	Taxes - Additional	Inability to Tax	Macomb County	DR0058	REQUEST NO. 58: All documents reflecting or relating to the basis for Your contention on Page 74 of the Amended Disclosure Statement that "State law precludes the City from charging fees that exceed the costs of providing the relevant services," including but not limited to any documents that reflect statutory, constitutional or charter provisions that support this contention.	Publicly Available (Declaration of Kevyn Orr)

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
946	Taxes - Additional	Inability to Tax	Retiree Committee	DR0022	All documents constituting, setting forth or discussing the financial debt capacity (including capacity to incur debt to cover pension and OPEB underfunding) and/or legal debt capacity of the City subsequent to any plan confirmation.	Ernst & Young
947	Taxes - Additional	Inability to Tax More	Ambac	DR0042	All documents that reflect any research or analysis conducted by or for the City related to its ability (or inability) to raise additional revenue through increases of existing taxes, assessments, or user fees; the levying of new taxes, assessments, user fees; or otherwise.	Publicly Available (Declaration of Kevyn Orr); Data Room
948	Taxes - Additional	Inability to Tax More	DWSD Discovery Parties	DR0080	80. All Documents reflecting research or analysis relating to the limits imposed by applicable law on the City's ability to incur debt.	Publicly Available (Declaration of Kevyn Orr); Data Room
949	Taxes - Additional	Inability to Tax More	DWSD Discovery Parties	DR0090	90. All Documents that reflect any research or analysis conducted by or for the City related to its ability (or inability) to raise additional revenue through increases of existing taxes, assessments, or user fees; the levying of new taxes, assessments, user fees; or otherwise.	Publicly Available (Declaration of Kevyn Orr); Data Room
950	Taxes - Additional	Inability to Tax More	EEPK FMS WT FGIC	DR0103	103. All Documents and Communications concerning any research or analysis conducted by or for the City related to its ability (or inability) to raise additional revenue through (a) increases of existing taxes, assessments, or user fees; (b) the levying of new taxes, assessments, or user fees; or (c) otherwise.	Publicly Available (Declaration of Kevyn Orr); Data Room
951	Taxes - Additional	Inability to Tax More	Macomb County	DR0057	REQUEST NO. 57: All documents reflecting or relating to the Emergency Manager's determination, referenced on page 21 of the Amended Disclosure Statement, that the City cannot gain additional revenue through the imposition of increased rates or additional taxes on City Residents.	Publicly Available (Declaration of Kevyn Orr); Data Room
952	Taxes - Additional	Inability to Tax More	Retirement Systems	DR0032	32. Produce all documents that reflect any research or analysis conducted by or for the City within the past 5 years related to its ability (or inability) to raise additional revenue through: increases of existing taxes, assessments, or user fees; the levying of new taxes, assessments, or user fees; or otherwise.	Publicly Available (Declaration of Kevyn Orr); Data Room
953	Taxes - Additional	Inability to Tax More	Syncora	DR0039	All documents created between January 1, 2013 and the present relating to the effects of raising taxes, assessments, or fees on the City and/or its residents.	Publicly Available (Declaration of Kevyn Orr); Data Room
954	Taxes - Amount	Disclosure Statement	Ambac	DR0098-A	All documents and communications that tend to support or refute the following statements contained in the Disclosure Statement: A. The charts and accompanying text on pages 39-42 purporting to show declines in revenue, income taxes, state shared revenue, and employment;	Publicly Available. As noted in the Disclosure Statement, the charts and accompanying text are supported by the City of Detroit Financial and Operating Plan (May 12, 2013), at pages 22.24, available at http://www.detroitmi.gov/Portals/0/docs/EM/Reports/City%20of%20Detroit%20-%20Final%20Financial%20&%20Operational%20Plan%20_45%20Day%20P1.pdf
955	Taxes - Analysis	Analysis - Changes	Ambac	DR0043	All documents that reflect any research or analysis conducted by or for the City related to the effects of tax changes enacted from 2009 to the present, including the effect of the tax changes on the City's economic growth or revenues.	Publicly Available (Declaration of Kevyn Orr); Data Room
956	Taxes - Analysis	Analysis - Comparative	Ambac	DR0004 2d	4. All documents and communications that relate to research or analysis by or for the City addressing comparisons to comparable, or any other, cities regarding: A. The size of post-Effective Date pension and other retiree benefits relative to gross revenue; B. The size of post-Effective Date debt relative to gross revenue; C. The size of post-Effective Date annual debt service relative to gross annual revenue; D. The size of post-Effective Date annual operating expenses relative to annual gross revenue; and E. Other similar comparisons with other cities that informed development of the Plan.	Conway MacKenzie Ernst & Young

Ref #	Topic	Subtopic	Objector	Req #	Text of Request	Custodians Searched and/or Who Provided Assistance
957	Taxes - Analysis	Analysis - Comparative	Ambac	DR0044	All documents that reflect any research or analysis conducted by or for the City related to any component of the tax burden on the City's residents in comparison to (a) surrounding areas or (b) cities of	Conway MacKenzie
958	Taxes - Analysis	Analysis - Comparative	Ambac	DR0098-B	B. Paragraph (c) at the bottom of page 42 discussing "Comparative Tax Burden;"	Publicly Available (Declaration of Kevyn Orr)
959	Taxes - Analysis	Analysis - Comparative	Syncora	DR0040	All documents created between January 1, 2013 and the present relating to the relative tax burden in the City compared to surrounding areas.	Publicly Available (Declaration of Kevyn Orr) Data Room
960	Taxes - Analysis	Analysis of comparables	DWSD Discovery Parties	DR0088	All Documents that reflect any research or analysis related to any component of the tax burden on the City's residents in comparison to (i) surrounding areas or (ii) cities of comparable size.	Data Room
961	Taxes - Analysis	Analysis on Growth	DWSD Discovery Parties	DR0089	All Documents that reflect any research or analysis related to the effects of tax changes enacted from January 1, 2009 to the present, including the effect of the tax changes on the City's economic growth or revenues.	Conway MacKenzie
962	Taxes - Assessments	Division Corrective Action Plan	EEPK FMS WT FGIC	DR0104	The Assessing Division Corrective Action Plan, including all drafts and exhibits thereto.	Conway MacKenzie
963	Taxes - Collection	Efforts to Improve Collection	Ambac	DR0047	All documents that reflect any research or analysis conducted by or for the City related to any initiatives to improve the City's collection of taxes, fines, or user fees, and/or to decrease the delinquency rates applicable to such collection.	Conway MacKenzie
964	Taxes - Collection	Efforts to Improve Collection	DWSD Discovery Parties	DR0087	All Documents that reflect any research or analysis related to any initiatives to improve the City's collection of taxes, fines, or user fees, and/or to decrease the delinquency rates applicable to such collection.	Conway MacKenzie
965	Taxes - Collection	Efforts to Improve Collection	Retirement Systems	DR0031	Produce all documents that reflect any research or analysis conducted by or for the City within the past 5 years related to any initiatives to improve the City's collection of taxes, fines, or user fees and/or to decrease the delinquency rates applicable to such collection.	Conway MacKenzie
966	Taxes - Collection	Efforts to Improve Collections	Retiree Committee	DR0021	All documents setting forth, discussing or analyzing the revenue adjustment and tax reforms referred to in Section X of the Amended Disclosure Statement, the plan for implementation for each such adjustment or reform and the estimated or projected increase in revenue resulting from each such adjustment or reform.	Conway MacKenzie
967	Taxes - Income	Compliance Rates	Syncora	DR0072	For the time period 1980 to the present, documents sufficient to show (a) the number of taxpayers who complied with their City income tax obligations and (b) the number of taxpayers who did not comply with their City income tax obligations.	Conway MacKenzie Ernst & Young Tanya Stoudemire
968	Taxes - Income	Uncollected Taxes	Syncora	DR0074	For the time period 1980 to the present, documents sufficient to show (a) the total payments due based on the City's income tax and (b) the total payments due but uncollected based on the City's income tax.	Conway MacKenzie
969	Taxes - Plan Statements	Gross Specified Tax Receipts	Ambac	DR0027	All documents that relate to the definition of the "certain incremental recurring gross specified tax receipts" from which the New C Notes will be paid.	Not Applicable